PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Pernod Ricard USA, Seagram Lawrenceburg Distillery
7 Ridge Avenue
Lawrenceburg, Indiana 47025

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 029-6929-00005	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 28, 2002 Expiration Date: June 28, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary distilled spirits production source.

Responsible Official:	Dan Gibb
Source Address:	7 Ridge Avenue, Lawrenceburg, Indiana 47025
Mailing Address:	P.O. Box 7, Lawrenceburg, Indiana 47025
General Source Phone Number:	812-537-0700
SIC Code:	2085
County Location:	Dearborn
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) pneumatic conveyor, known as EU-11, installed prior to 1950, equipped with a dust collector exhausted to S-103, capacity: 28.0 tons of corn, rye, barley and/or malt per hour.

(b) One (1) corn receiving and storage system, known as EU-12, installed in 1997, consisting of the following equipment:

(1) One (1) unloading hopper, exhausted to S-111, controlled by fabric filters for particulate matter control, capacity: 196 tons of corn per hour.

(2) One (1) conveyor and bucket elevator, exhausted to S-111, controlled by fabric filters for particulate matter control, capacity: 196 tons of corn per hour.

(3) One (1) storage silo, exhausted to S-111, controlled by fabric filters for particulate matter control, capacity: 75,000 bushels of corn.

(4) One (1) grain cleaner, exhausted to S-111, controlled by fabric filters for particulate matter control, capacity: 26.6 tons of corn per hour.

(5) One (1) grain transport system, exhausted to S-112, controlled by fabric filters for particulate matter control, capacity: 26.6 tons of corn per hour.

(c) Six (6) hammermills, collectively known as EU-14, exhausted to S-104, equipped with a baghouse for particulate matter control, installed prior to 1950, capacity: 109,760 pounds of grain per hour, total.

(d) Seven (7) storage bins, collectively known as EU-13, exhausted to S-103, installed prior to 1950, equipped with fabric filters for particulate matter control, five (5) with a capacity of 8,000 bushels, each and two (2) with a capacity of 4,000 bushels, each.

(e) Fourteen (14) open fermenters, collectively known as EU-21, exhausted to S-201, installed prior to 1950, capacity: 25,300 gallons, each.

(f) Twenty-four (24) closed fermenters, collectively known as EU-22, exhausted to S-202, collectively exhausted to one (1) ethanol scrubber, installed prior to 1950, capacity: 55,000 gallons, each.

(g) Two (2) beer wells #1 and #3, known as EU-23 and EU-24, respectively, exhausted to S-203 and S-204 respectively, installed prior to 1950, capacity: 38,886 and 102,098 gallons, respectively.

(h) Three (3) beer stills, collectively known as EU-25, exhausted to S-205, installed prior to 1950:

(1) Still #25, capacity: 4,600 gallons per hour,

(2) Still #26, capacity: 14,600 gallons per hour; and

(3) Still #31, capacity: 12,000 gallons per hour.

(i) Two (2) column & kettles, collectively known as EU-26, exhausted to S-206, installed prior to 1950, capacity: 727 proof gallons per hour, each.

(j) Three (3) gin stills #10, #22, and #23, collectively known as EU-27, exhausted to S-207, installed prior to 1950, capacity: 600 proof gallons per hour, each.

(k) One (1) doubler still, known as EU-29, exhausted to stack S-209, installed prior to 1950, capacity: 672 proof gallons per hour.

(l) Three (3) multi-column stills and five (5) distillation columns, known as EU-20 installed prior to 1950, consists of the following:

(1) spirits still V-2, exhausted to S-210, capacity: 583 proof gallons per hour,

(2) spirits still V-3, exhausted to S-210, capacity: 750 proof gallons per hour,

(3) spirits still V-15, exhausted to S-210, capacity: 3,750 proof gallons per hour;

(4) one (1) distillation column, exhausted to S-211, and

(5) four (4) unused distillation columns, exhausted to S-211.

(m) Four (4) paddle screens, collectively known as EU-31, installed prior to 1950, exhausted to S-301, capacity: 56,000 pounds per hour, each.

(n) Five (5) rotary dryers, one (1) cooler and one (1) transport system, known as EU-32 installed prior to 1950, consists of the following:

(1) Two (2) rotary dryers, exhausted to S-305 and S-306, each controlled by a wet

scrubber, capacity: 25,500 pound per hour, each,

(2) Three (3) rotary dryers, exhausted to S-307 through S-309, each controlled by a wet scrubber, capacity: 14,500 pounds per hour, each; and

(3) One (1) cooler and one (1) transport system, controlled by a cyclone, exhausted to S-310, capacity: 6.5 tons per hour.

(o) EU-33 installed prior to 1950, consists of the following:

(1) Three (3) conveyors, exhausted to S-302-S-304, capacity: 38,000 pounds per hour, each.

(p) One (1) DDG (Distillers Dried Grain) loadout system, installed in 1997 consists of the following:

(1) Two (2) storage silos, capacity: 13,100 cubic feet, each and two (2) surge hoppers, capacity: 7.0 tons per hour, each, known as, EU-34, equipped with two (2) dust collectors exhausted to S-341 - S-344.

(2) One (1) air transport system and scale to the rail car loading area, known as EU-35, controlled by a dust collector, exhausted to S-350, capacity: 7.0 tons per hour.

(3) One (1) air transport system and scale to the truck loading area, known as EU-36, controlled by a dust collector, exhausted to S-360, capacity: 7.0 tons per hour.

(4) One (1) rail car loader, known as EU-37, exhausted to S-370, capacity: 7.0 tons per hour.

(5) One (1) truck loader, known as EU-38, exhausted to S-380, capacity: 7.0 tons per hour.

(6) One (1) old DDG loader, known as EU-39, exhausted to S-111, capacity: 7.0 tons per hour.

(q) One (1) wine room, known as EU-41, consisting of thirty-five (35) tanks, installed prior to 1950, exhausted to S-410, capacity: 467,517 gallons of ethanol, total.

(r) One (1) tank farm, known as EU-42, consisting of nine (9) tanks, installed prior to 1950, exhausted to S-420, capacity: 750,000 gallons of ethanol, each.

(s) One (1) Bldg 88, known as EU-43, consisting of twenty-seven (27) tanks and, installed in 1989, exhausted to S-430, capacity: 489,250 gallons of ethanol, total and one (1) rum handling, installed in 1997, exhausted to the atmosphere, capacity: 3,501,429 gallons of rum.

(t) One (1) regauge tank area, known as EU-44, consisting of forty-seven (47) tanks, installed in 1960, exhausted to S-440, capacity: 445,858 gallons of ethanol, total.

(u) One (1) mini tank farm, known as EU-45, to consist of nine (9) tanks, seven tanks installed in 1989, exhausted to S-435, capacity: 779,800 gallons of ethanol, total, two (2) gin storage tanks, installed in 1997, capacity: 113,800 gallons of gin, each.

(v) One (1) bottling tank room, known as EU-51, consisting of forty-one (41) tanks, installed in 1969, exhausted to S-510, capacity: 412,000 gallons of ethanol, total.

(w) Seven (7) bottling lines, known as EU-52, installed prior to 1950, exhausted to S-520, capacity: 7,264 cases per hour.

(x) One (1) cooler operation, known as EU-53, installed prior to 1988, exhausted to S-530, capacity: 2,187 cases per hour.

(y) One (1) Warehouse C, known as EU-71, installed prior to 1950, exhausted to S-701, capacity: 69,306 barrels.

(z) One (1) Warehouse E, known as EU-72, installed prior to 1950, exhausted to S-702, capacity: 101,032 barrels.

(aa) One (1) Warehouse G, known as EU-73, installed prior to 1950, exhausted to S-703, capacity: 84,097 barrels.

(bb) One (1) Warehouse J & M, known as EU-74, installed prior to 1950, exhausted to S-704, capacity: 100,000 barrels.

(cc) One (1) Warehouse L, known as EU-75, installed prior to 1950, exhausted to S-705, capacity: 93,438 barrels.

(dd) One (1) Warehouse N, known as EU-76, installed prior to 1950, exhausted to S-706, capacity: 93,405 barrels.

(ee) One (1) steam boiler, known as EU-96, using coal, CBAF, natural gas, fuel oil #6, and/or wood, installed in 1977, exhausted to S-906, equipped with an electrostatic precipitator for particulate matter control, rated at 244 million British thermal units per hour.

(ff) One (1) natural gas fired steam boiler, known as EU-97 using fuel oil #2 as back-up, installed in 1992, exhausted to S- 907, rated at 47.6 million British thermal units per hour using natural gas and 45.6 million British thermal units using fuel oil #2.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a

shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

(a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally

enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Maintenance of Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the continuous opacity monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

(b) Whenever the continuous opacity monitor is malfunctioning or will be down for repairs or adjustments for a period of four (4) hours or more, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time.

(c) If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight.

(d) Method 9 opacity readings shall be repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.

(e) The opacity readings during this period shall be reported in the quarterly Compliance Monitoring Reports, unless there are ANY observed six minute averaged exceedances, in which case, these shall be reported to the air compliance inspector within four (4) working hours.

(f) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary opacity monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is

due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) pneumatic conveyor, known as EU-11, installed prior to 1950, equipped with a dust collector exhausted to S-103, capacity: 28.0 tons of corn, rye, barley and/or malt per hour.

(b) One (1) corn receiving and storage system, known as EU-12, installed in 1997, consisting of the following equipment:

(1) One (1) unloading hopper, exhausted to S-111, controlled by fabric filters for particulate matter control, capacity: 196 tons of corn per hour.

(2) One (1) conveyor and bucket elevator, exhausted to S-111, controlled by fabric filters for particulate matter control, capacity: 196 tons of corn per hour.

(3) One (1) storage silo, exhausted to S-111, controlled by fabric filters for particulate matter control, capacity: 75,000 bushels of corn.

(4) One (1) grain cleaner, exhausted to S-111, controlled by fabric filters for particulate matter control, capacity: 26.6 tons of corn per hour.

(5) One (1) grain transport system, exhausted to S-112, controlled by fabric filters for particulate matter control, capacity: 26.6 tons of corn per hour.

(c) Six (6) hammermills, collectively known as EU-14, exhausted to S-104, equipped with a baghouse for particulate matter control, installed prior to 1950, capacity: 109,760 pounds of grain per hour, total.

(d) Seven (7) storage bins, collectively known as EU-13, exhausted to S-103, installed prior to 1950, equipped with fabric filters for particulate matter control, five (5) with a capacity of 8,000 bushels, each and two (2) with a capacity of 4,000 bushels, each.

(e) Fourteen (14) open fermenters, collectively known as EU-21, exhausted to S-201, installed prior to 1950, capacity: 25,300 gallons, each.

(f) Twenty-four (24) closed fermenters, collectively known as EU-22, exhausted to S-202, collectively exhausted to one (1) ethanol scrubber, installed prior to 1950, capacity: 55,000 gallons, each.

(g) Two (2) beer wells #1 and #3, known as EU-23 and EU-24, respectively, exhausted to S-203 and S-204 respectively, installed prior to 1950, capacity: 38,886 and 102,098 gallons, respectively.

(h) Three (3) beer stills, collectively known as EU-25, exhausted to S-205, installed prior to 1950:

(1) Still #25, capacity: 4,600 gallons per hour,

(2) Still #26, capacity: 14,600 gallons per hour; and

(3) Still #31, capacity: 12,000 gallons per hour.

(i) Two (2) column & kettles, collectively known as EU-26, exhausted to S-206, installed prior to 1950, capacity: 727 proof gallons per hour, each.

(j) Three (3) gin stills #10, #22, and #23, collectively known as EU-27, exhausted to S-207, installed prior to 1950, capacity: 600 proof gallons per hour, each.

(k) One (1) doubler still, known as EU-29, exhausted to stack S-209, installed prior to 1950, capacity: 672 proof gallons per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Facility Description [326 IAC 2-7-5(15)]: continued

(l) Three (3) multi-column stills and five (5) distillation columns, known as EU-20 installed prior to 1950, consists of the following:

(1) spirits still V-2, exhausted to S-210, capacity: 583 proof gallons per hour,

(2) spirits still V-3, exhausted to S-210, capacity: 750 proof gallons per hour,

(3) spirits still V-15, exhausted to S-210, capacity: 3,750 proof gallons per hour;

(4) one (1) distillation column, exhausted to S-211, and

(5) four (4) unused distillation columns, exhausted to S-211.

(m) Four (4) paddle screens, collectively known as EU-31, installed prior to 1950, exhausted to S-301, capacity: 56,000 pounds per hour, each.

(n) Five (5) rotary dryers, one (1) cooler and one (1) transport system, known as EU-32 installed prior to 1950, consists of the following:

(1) Two (2) rotary dryers, exhausted to S-305 and S-306, each controlled by a wet scrubber, capacity: 25,500 pound per hour, each,

(2) Three (3) rotary dryers, exhausted to S-307 through S-309, each controlled by a wet scrubber, capacity: 14,500 pounds per hour, each; and

(3) One (1) cooler and one (1) transport system, controlled by a cyclone, exhausted to S-310, capacity: 6.5 tons per hour.

(o) EU-33 installed prior to 1950, consists of the following:

(1) Three (3) conveyors, exhausted to S-302-S-304, capacity: 38,000 pounds per hour, each.

(p) One (1) DDG (Distillers Dried Grain) loadout system, installed in 1997 consists of the following:

(1) Two (2) storage silos, capacity: 13,100 cubic feet, each and two (2) surge hoppers, capacity: 7.0 tons per hour, each, known as, EU-34, equipped with two (2) dust collectors exhausted to S-341 - S-344.

(2) One (1) air transport system and scale to the rail car loading area, known as EU-35, controlled by a dust collector, exhausted to S-350, capacity: 7.0 tons per hour.

(3) One (1) air transport system and scale to the truck loading area, known as EU-36, controlled by a dust collector, exhausted to S-360, capacity: 7.0 tons per hour.

(4) One (1) rail car loader, known as EU-37, exhausted to S-370, capacity: 7.0 tons per hour.

(5) One (1) truck loader, known as EU-38, exhausted to S-380, capacity: 7.0 tons per hour.

(6) One (1) old DDG loader, known as EU-39, exhausted to S-111, capacity: 7.0 tons per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2]

Pursuant to CP 029-6331-00005, issued March 14, 1997, the particulate matter (PM) and PM_{10} emissions from:

(a) The corn truck unloading hopper, grain receiving elevator and conveyor, corn storage silo, and grain cleaner (part of EU-12) shall not exceed 1.20 pounds per hour, equivalent to 5.26 tons per twelve (12) consecutive month period.

(b) The grain air transport system in EU-12 shall not exceed 0.219 pounds per hour, equivalent to 0.959 tons per twelve (12) consecutive month period.

(c) EU-34 shall not exceed 0.136 pounds per hour, equivalent to 0.596 tons per twelve (12) consecutive month period.

(d) EU-35 and EU-36 shall not exceed 0.289 pounds per hour total, equivalent to 1.27 tons per twelve (12) consecutive month period.

(e) EU-37 and EU-38 shall not exceed a total of 1.25 pounds per hour, equivalent to 5.48 tons per twelve (12) consecutive month period.

Compliance with these limits makes the provisions of 326 IAC 2-2 not applicable.

D.1.2 Non-Applicability of Previous Permit Conditions [326 IAC 2-2] [40 CFR 52.21]

The requirement from OP 15-01-87-0087 and OP 15-01-87-0088, both issued January 1984, which limited PM and PM_{10} emissions from EU-11 and EU-14 to 3.0 tons per year and EU-32 to 60.0 tons pr year are not being carried into this Part 70 operating permit because each of these emission units were constructed prior to the applicability to 326 IAC 2-2. Therefore, Condition 5 of both OP 15-01-87-0087 and OP 15-01-87-0088 is hereby rescinded.

D.1.3 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1 (Nonattainment area limitations), the allowable particulate matter (PM) emission rates shall not exceed 0.03 grains per dry standard cubic foot of outlet air from EU-11 through EU-14, EU-32 and EU-34 through EU-39.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the control devices for EU-11, 12, and 31 - 38.

Compliance Determination Requirements

D.1.5 Particulate Matter (PM)

(a) In order to comply with Conditions D.1.1 and D.1.3, except as otherwise provided by statute or rule or in this permit, the baghouses for PM control shall be in operation and control emissions from the EU-11 through, EU-14 and EU-34 through EU-36, at all times that the processes are in operation.

(b) In order to comply with Condition D.1.3, except as otherwise provided by statute or rule or in this permit, the scrubbers and cyclone for PM control shall be in operation and control emissions from the EU-32, at all times that the dryers, cooler and transport system are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Visible Emissions Notations

(a) Visible emission notations of the EU-11, 12, 32, 34 - 38 stack exhausts S-103, S-111, S-112, S-305 through S-310, S-341 through S-343, S-350, S-360, S-370 and S-380 shall be performed

once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.7 Baghouse Parametric Monitoring

The Permittee shall record the total static pressure drop across each baghouse used in conjunction with the EU-11, 12, 34, 35 and 36, at least once per shift when these processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 5.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.8 Baghouse Inspections

An inspection shall be performed semi-annually of all bags controlling EU-11, 12, 34, 35 and 36 when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and semi-annually thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with

Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.10 Scrubber Parametric Monitoring

The Permittee shall record the total static pressure drop across the scrubbers used in conjunction with EU-32 at least once per shift when these processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the scrubbers is outside the normal range of 0.5 and 6.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.11 Liquor Flow Rate

The Permittee shall record the flow rate of the scrubbing liquor used in conjunction with the dryers, EU-32, at least once per shift when this emission unit is in operation when venting to the atmosphere. When for any one reading, the liquor flow rate is below a minimum flow of 4.0 gallons per minute for the nozzles and 10.0 gallons per minute for the trays for scrubbers exhausted to stacks S-305 and S-306 as well as below a minimum flow of 3.0 gallons per minute for the nozzles and 7.0 gallons per minute for the trays for scrubbers exhausted to stacks S-307 through S-309 or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A flow rate reading that is less than the above mentioned minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.12 Scrubber Inspections

An inspection shall be performed semi-annually of the scrubbers for EU-32. Defective scrubber parts shall be replaced. A record shall be kept of the results of the inspection.

D.1.13 Failure Detection

In the event that a scrubber failure for EU-32 has been observed:

If failure is indicated by a significant drop in the scrubber's pressure readings with abnormal visible

emissions or the failure is indicated by an opacity violation, or if scrubber failure is determined by other means, such as flow rates, air infiltration, leaks, or pH, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B).

D.1.14 Cyclone Inspections

An inspection shall be performed semi-annually of all cyclones controlling the cooler and transport operation, EU-32, when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and semi-annually thereafter. Inspections are optional when venting to the indoors.

D.1.15 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.16 Record Keeping Requirements

(a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations once per shift of the Stack exhausts S-103, S-111, S-112, S-305 through S-310, S-341 through S-343, S-350, S-360, S-370 and S-380.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain the following:

(1) Records of the inlet and outlet differential static pressure during normal operation when venting to the atmosphere once per shift.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.1.10, the Permittee shall maintain once per shift records of the total static pressure drop of the scrubbers for EU-32 during normal operation when venting to the atmosphere.

(d) To document compliance with Condition D.1.11, the Permittee shall maintain once per shift records of the liquor flow rate of the scrubbers for EU-32 during normal operation when venting to the atmosphere.

(e) To document compliance with Conditions D.1.8, D.1.12 and D.1.14 the Permittee shall maintain records of the results of the inspections required under Conditions D.1.8, D.1.12 and D.1.14 and the dates the vents are redirected.

(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(q) One (1) wine room, known as EU-41, consisting of thirty-five (35) tanks, installed prior to 1950, exhausted to S-410, capacity: 467,517 gallons of ethanol, total.

(r) One (1) tank farm, known as EU-42, consisting of nine (9) tanks, installed prior to 1950, exhausted to S-420, capacity: 750,000 gallons of ethanol, each.

(s) One (1) Bldg 88, known as EU-43, consisting of twenty-seven (27) tanks and, installed in 1989, exhausted to S-430, capacity: 489,250 gallons of ethanol, total and one (1) rum handling, installed in 1997, exhausted to the atmosphere, capacity: 3,501,429 gallons of rum.

(t) One (1) regauge tank area, known as EU-44, consisting of forty-seven (47) tanks, installed in 1960, exhausted to S-440, capacity: 445,858 gallons of ethanol, total.

(u) One (1) mini tank farm, known as EU-45, to consist of nine (9) tanks, seven tanks installed in 1989, exhausted to S-435, capacity: 779,800 gallons of ethanol, total, two (2) gin storage tanks, installed in 1997, capacity: 113,800 gallons of gin, each.

(v) One (1) bottling tank room, known as EU-51, consisting of forty-one (41) tanks, installed in 1969, exhausted to S-510, capacity: 412,000 gallons of ethanol, total.

(w) Seven (7) bottling lines, known as EU-52, installed prior to 1950, exhausted to S-520, capacity: 7,264 cases per hour.

(x) One (1) cooler operation, known as EU-53, installed prior to 1988, exhausted to S-530, capacity: 2,187 cases per hour.

(y) One (1) Warehouse C, known as EU-71, installed prior to 1950, exhausted to S-701, capacity: 69,306 barrels.

(z) One (1) Warehouse E, known as EU-72, installed prior to 1950, exhausted to S-702, capacity: 101,032 barrels.

(aa) One (1) Warehouse G, known as EU-73, installed prior to 1950, exhausted to S-703, capacity: 84,097 barrels.

(bb) One (1) Warehouse J & M, known as EU-74, installed prior to 1950, exhausted to S-704, capacity: 100,000 barrels.

(cc) One (1) Warehouse L, known as EU-75, installed prior to 1950, exhausted to S-705, capacity: 93,438 barrels.

(dd) One (1) Warehouse N, known as EU-76, installed prior to 1950, exhausted to S-706, capacity: 93,405 barrels.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD [326 IAC 2-2] [40 CFR 52.21]

The applicable requirements for these facilities are listed in Sections B and C of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.2 Record Keeping Requirements [326 IAC 2-6]

(a) The Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to comply with all emission reporting requirements:

(1) The number of barrels in storage, and

(2) The material(s) being stored in each barrel.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(ee) One (1) steam boiler, known as EU-96, using coal, CBAF, natural gas, fuel oil #6, and/or wood, installed in 1977, exhausted to S-906, equipped with an electrostatic precipitator for particulate matter control, rated at 244 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-8]

Pursuant to 326 IAC 6-1-8.1, the particulate matter emissions from steam boiler, known as EU-96, shall be limited to:

(a) 0.180 pounds per million British thermal units, and

(b) 85,096 tons of coal per twelve (12) consecutive month period, equivalent to 214.2 tons of PM per year. The minimum overall PM control efficiency for the electrostatic precipitator on this boiler shall not be less than 94.4% to comply with this limit when firing coal, CBAF or wood. For purposes of showing compliance with this fuel limit, the following equivalencies shall be used:

(1) One (1) million cubic feet of natural gas is equivalent to 0.021 tons of coal,

(2) One kilogallon of No. 6 fuel oil is equivalent to 0.138 tons of coal, and

(3) One (1) ton of wood is equivalent to 0.056 tons of coal.

D.3.2 Sulfur Dioxide (SO_2) [326 IAC 7-4-13(3)(A)] [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-4-13(3)(A), the steam boiler, known as EU-96, is limited to 1.92 pounds of SO_2 per million British thermal units when burning coal or No. 6 fuel oil. This limit will also satisfy the requirements of 326 IAC 7-1.1-1.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.4 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 7-2-1] [40 CFR Part 60 Subpart Dc]

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed 1.92 pounds of SO_2 per million British thermal units when burning coal or No. 6 fuel oil. Compliance shall be determined utilizing the following options:

(a) Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier as described under 40 CFR 60.48c(f)(3). The certification shall include:

(1) The name of the coal supplier; and

(2) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and

(3) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and

(4) The methods used to determine the properties of the coal; and

(b) Coal sampling and analysis shall be performed using one of the following procedures:

(1) Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)(3)]:

(A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;

(B) Coal shall be sampled at least three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period;

(C) Minimum sample size shall be five hundred (500) grams;

(D) Samples shall be composited and analyzed at the end of each calendar month;

(E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or

(2) Sample and analyze the coal pursuant to 326 IAC 3-7-2(a);

(3) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or

(c) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(e)]

(d) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

(e) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;

(f) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(g) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the two hundred and forty-four (244) million British thermal units per hour, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (e) or (f) above shall not be refuted by evidence of compliance pursuant to the other method.

D.3.5 Testing Requirements [326 IAC 2-7-6(1,6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Conditions D.3.1 and D.3.2, the Permittee shall perform SO_2 and PM testing of the coal boiler emissions utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.3.6 Particulate Matter (PM)

In order to comply with Condition D.3.1, except as otherwise provided by statute or rule or in this permit, the electrostatic precipitator for PM control shall be in operation and control emissions from the steam boiler, known as EU-96, at all times that the steam boiler is in operation and is firing coal, CBAF or wood.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Continuous Opacity Monitors

Pursuant to 326 IAC 5-1-2 and 326 IAC 5-1-3, opacity from EU-96 shall comply with the following requirements:

(a) The Permittee shall continuously operate the opacity monitoring devices on EU-96, in accordance with the requirements of Condition C.13 (Maintenance of Opacity Monitoring Equipment) to insure compliance with the opacity limits of Condition C.2 (Opacity).

(b) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period.

(c) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

(d) When building a new fire in a boiler, or shutting down a boiler, capacity may exceed the applicable limit; however, opacity levels shall not exceed sixty percent (60%) for any six (6) minute averaging period. Opacity in excess of the applicable limit shall not continue for more

than two (2) six (6) minute averaging periods in any twenty-four (24) hour period.

(e) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes or the airheater, opacity may exceed the applicable opacity limit; however, opacity shall not exceed sixty percent (60%) for any six (6) minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6) minute averaging period in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6) minute averaging periods in a twelve (12) hour period.

D.3.8 Opacity Readings

(a) The source will operate a continuous opacity monitor pursuant to 326 IAC 3.

(b) Appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the opacity exceeds thirty (30%) percent*. In the event of opacity exceeding thirty-five (35%) percent*, the boiler will be shut down or switched to only natural gas fuel, if necessary, so that T-R sets or the electrostatic precipitator can be repaired or the cause(s) leading to T-R set outages or electrostatic precipitator malfunction can be corrected.

(c) The instrument used for determining the T-R set voltage shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

* (Other values may be used if it can be demonstrated that a higher opacity can be reached without demonstrating noncompliance with the PM limitation, but in no case rise above thirty-five (35%) percent. Response steps planned to restore T-R sets or repair the electrostatic precipitator are to be included in the Preventive Maintenance Plan.)

D.3.9 Preventative Inspections

(a) The following inspections shall be performed at least once every twelve (12) months in accordance with the Preventive Maintenance Plan prepared in accordance with Section B - Preventive Maintenance Plan:

(1) Plate and electrode alignment;

(2) Electrostatic precipitator component/controller failure;

(3) Air and water infiltration;

(4) Start-up and shutdown practices;

(5) Spare parts availability; and

(6) Flyash conveyance.

(b) Plate and electrode alignment measurements shall be taken whenever there is an outage of any nature lasting more than three (3) days unless such measurements have been taken within the past six (6) months.

D.3.10 Parametric Monitoring

(a) The ability of the electrostatic precipitator to control particulate emissions shall be monitored once per shift, when the unit is in operation, by measuring and recording the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.

(b) When for any one reading, operation is outside one of the normal ranges shown below, or a range established during the latest stack test, the Permittee shall take reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever operation is outside any of the following ranges:

(1) Primary voltage: 260 - 300 V

(2) Secondary voltage: 35 - 55 kV

(3) T-R set primary current: 50 -75 A

(c) The instrument used for determining the T-R set voltage shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.11 Record Keeping Requirements

(a) To document compliance with Conditions D.3.1, D.3.2 and D.3.4, the Permittee shall maintain records in accordance with (1) through (11) below. Records maintained for (1) through (11) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO_2 emission limits established in Conditions D.3.1, D.3.2 and D.3.4.

(1) Calendar dates covered in the compliance determination period,

(2) Actual coal usage since last monthly compliance determination period,

(3) Sulfur content, heat content, and ash content,

(4) Sulfur dioxide emission rates,

(5) Vendor analysis of coal and coal supplier certification,

(6) Actual fuel oil usage since last compliance determination period,

(7) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used,

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

(8) Fuel supplier certifications,

(9) The name of the fuel supplier,

(10) A statement from the fuel supplier that certifies the sulfur content of the fuel oil, and

(11) Actual wood usage since last compliance determination period.

(b) To document compliance with Conditions D.3.7 and D.3.8, the Permittee shall maintain records of the continuous opacity monitor for the boiler stack S-906 exhaust while combusting

coal, oil or wood

(c) To document compliance with Condition D.3.9, the Permittee shall maintain records of the following inspections and measurements:

(1) Plate and electrode alignment;

(2) Electrostatic precipitator component/controller failure;

(3) Air and water infiltration;

(4) Start-up and shutdown practices;

(5) Spare parts availability;

(6) Flyash conveyance;

(7) Plate and electrode alignment; and

(8) All other inspections.

(d) To document compliance with Condition D.3.10, the Permittee shall maintain records of the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.

(e) The record keeping required by 326 IAC 7-4-13(3)(B) are no longer applicable since only Boiler No. 6, now known as EU-96, remains in service and Boiler 5 has been removed from the source.

326 IAC 7-4-13(3)(B) stated that if Boilers 5 and 6 are being operated at the same time, only one (1) of the boilers may use coal or fuel oil. Seagram shall maintain a record of the fuel type used at Boilers 5 and 6 in order to demonstrate compliance with the requirements of this rule. When both boilers are operating simultaneously, daily logs shall be kept. Such records shall be made available to the department upon request. Within thirty (30) days following the end of the calendar quarter in which both Boilers 5 and 6 operated simultaneously, Seagram shall report to the department the fuels used, including daily information for each day during which both boilers operated simultaneously.

(f) The record keeping and reporting requirements for Boiler No. 5 under 326 IAC 6-1-8.1(c)(6) are no longer applicable since Boiler No. 5 has been removed from service.

326 IAC 6-1-8.1(c)(6) requires Seagram to submit quarterly reports for Boiler No. 5 and Boiler No. 6 (EU-96) that reflect the particulate matter emissions from each boiler for the prior 12 months. Since Boiler No. 5 has been removed from service, this record keeping and reporting requirement for Boiler No.5 are no longer applicable.

(g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.12 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30)

days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(ff) One (1) natural gas fired steam boiler, known as EU-97 using fuel oil #2 as back-up, installed in 1992, exhausted to S- 907, rated at 47.6 million British thermal units per hour using natural gas and 45.6 million British thermal units using fuel oil #2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter Limitation (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(b)(3) (Particulate emission limitations), the particulate matter emissions from steam boiler, known as EU-97, shall be limited to 0.01 grains per dry standard cubic foot.

D.4.2 PSD Limit [326 IAC 2-2][326 IAC 7-1][326 IAC 12-1] [40 CFR 52.21]

(a) Pursuant to CP 029-2159-00005 issued February 10, 1992, steam boiler, known as EU-97, shall be limited to 1,848,000 gallons of No. 2 fuel oil per twelve (12) consecutive month period and no fuel shall be combusted that contains greater than 0.3% sulfur. These limits limit the source to 39.9 tons sulfur dioxide per year; therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply. These limits will also satisfy the requirements of 326 IAC 7-1 and 326 IAC 12-1.

(b) Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

D.4.3 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60 Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60 Subpart Dc

D.4.4 Sulfur Dioxide (SO_2) [326 IAC 7-1.1-1] [326 IAC 12-1]

Pursuant to 326 IAC 7-1.1 (SO_2 Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

(a) The SO_2 emissions from the 45.6 million British thermal units per hour oil-fueled boiler shall not exceed five tenths (0.5) pounds per million Btu heat input; or

(b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

Compliance Determination Requirements

D.4.5 Sulfur Dioxide Emissions and Sulfur Content [40 CFR 60, Subpart Dc]

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

(a) Providing vendor analysis of fuel delivered, if accompanied by a certification; or

(b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Visible Emissions Notations

(a) Visible emission notations of the steam boiler, known as EU-97, stack exhaust shall be performed once per shift during normal daylight operations when burning No. 2 fuel oil and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements

(a) To document compliance with Conditions D.4.2 and D.4.5, the Permittee shall maintain records in accordance with (1) through (6) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) To document compliance with Condition D.4.6, the Permittee shall maintain records of visible emission notations of the EU-97 stack exhaust once per shift when burning No. 2 fuel oil.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

D.4.9 Natural Gas-Fired Boiler Certification

An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year.

SECTION D.5 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1 (Particulate emission limitations), the particulate matter emissions from the grinding and machining operations activities shall be limited to 0.03 grains per dry standard cubic foot, pursuant to 326 IAC 6-1-2(a).

Compliance Determination Requirements

D.5.2 Particulate Matter (PM)

In order to comply with Condition D.5.1, the PM controls shall be in operation at all times and control emissions from the grinding and machining operations, including the deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking, when these processes are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Pernod Ricard USA, Seagram Lawrenceburg Distillery
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Mailing Address: P.O. Box 7, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T 029-6929-00005

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Pernod Ricard USA, Seagram Lawrenceburg Distillery
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Mailing Address: P.O. Box 7, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T 029-6929-00005

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS-FIRED BOILER CERTIFICATION

Source Name: Pernod Ricard USA, Seagram Lawrenceburg Distillery
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Mailing Address: P.O. Box 7, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T 029-6929-00005

9	Natural Gas Only
9	Alternate Fuel burned
	From: _____ To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Pernod Ricard USA, Seagram Lawrenceburg Distillery
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Mailing Address: P.O. Box 7, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T 029-6929-00005
Facility: EU-97
Parameter: No. 2 fuel oil
Limit: 1,848,000 gallons per twelve (12) consecutive month period, equivalent to SO_2 emissions of 39.9 tons per year

YEAR: _____

Month	Fuel Oil (gallons)	Fuel Oil (gallons)	Fuel Oil (gallons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Pernod Ricard USA, Seagram Lawrenceburg Distillery
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Mailing Address: P.O. Box 7, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T 029-6929-00005
Facility: EU-96
Parameter: Amount of coal burned or equivalent
Limit: 85,096 tons of coal per twelve (12) consecutive month period, equivalent to 214.2 tons of PM per year.

For purposes of showing compliance with this fuel limit, the following equivalencies shall be used: one (1) million cubic feet of natural gas is equivalent to 0.021 tons of coal, one kilogallon of No. 6 fuel oil is equivalent to 0.138 tons of coal, and one (1) ton of wood is equivalent to 0.056 tons of coal.

YEAR: _____

Month	Coal Burned or Equivalent (tons)	Coal Burned or Equivalent (tons)	Coal Burned or Equivalent (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Pernod Ricard USA, Seagram Lawrenceburg Distillery
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Mailing Address: P.O. Box 7, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T 029-6929-00005

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

June 28, 2002

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	**Pernod Ricard USA, Seagram Lawrenceburg Distillery**
Source Location:	**7 Ridge Avenue, Lawrenceburg, Indiana 47025**
County:	**Dearborn**
SIC Code:	**2085**
Operation Permit No.:	**T 029-6929-00005**
Permit Reviewer:	**Frank P. Castelli/Paula M. Cognitore**

On November 7, 2001, the Office of Air Quality (OAQ) had a notice published in the Journal Press, Lawrenceburg, Indiana, stating that Joseph E. Seagram & Sons, Inc., now called Pernod Ricard USA, Seagram Lawrenceburg Distillery, had applied for a Part 70 Operating Permit to operate a distilled spirits production source. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On December 11, 2001, Anthony C. Sullivan, Esq of Barnes & Thornburg, attorney for the source, submitted comments on the proposed Part 70 Operating Permit. The comments are as follows: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**: The ownership of Joseph E. Seagram & Sons, Inc. has been transferred to Pernod Ricard USA, Seagram Lawrenceburg Distillery pursuant to 029-15439-00005, issued April 1, 2002. Therefore, all references to the company have been changed to **Pernod Ricard USA, Seagram Lawrenceburg Distillery** throughout the proposed permit and are not shown within this Addendum.

Comment 1:

Condition A.2 – Emission Units and Pollution Control Summary – All references to "capacity" should be stated as "estimated capacity" because the capacities listed in the description are estimated values and not fixed limits. In addition, regarding the description of the boiler, the term "coal" should be moved to indicate that coal is one of many fuels. Condition A.2 should be modified as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) pneumatic conveyor, known as EU-11, installed prior to 1950, equipped with a dust collector exhausted to S-103, estimated capacity: 28.0 tons of corn, rye, barley and/or malt per hour.

(b) One (1) corn receiving and storage system, known as EU-12, installed in 1997, consisting of the following equipment:

(1) One (1) unloading hopper, exhausted to S-111, controlled by fabric filters for particulate matter control, estimated capacity: 196 tons of corn per hour.

(2) One (1) conveyor and bucket elevator, exhausted to S-111, controlled by fabric filters for particulate matter control, estimated capacity: 196 tons of corn per hour.

(3) One (1) storage silo, exhausted to S-111, controlled by fabric filters for particulate matter control, estimated capacity: 75,000 bushels of corn.

(4) One (1) grain cleaner, exhausted to S-111, controlled by fabric filters for particulate matter control, estimated capacity: 26.6 tons of corn per hour.

(5) One (1) grain transport system, exhausted to S-112, controlled by fabric filters for particulate matter control, estimated capacity: 26.6 tons of corn per hour.

(c) Six (6) hammermills, collectively known as EU-14, exhausted to S-104, equipped with a baghouse for particulate matter control, installed prior to 1950, estimated capacity: 109,760 pounds of grain per hour, total.

(d) Seven (7) storage bins, collectively known as EU-13, exhausted to S-103, installed prior to 1950, equipped with fabric filters for particulate matter control, five (5) with an estimated capacity of 8,000 bushels, each and two (2) with an estimated capacity of 4,000 bushels, each.

(e) Fourteen (14) open fermenters, collectively known as EU-21, exhausted to S-201, installed prior to 1950, estimated capacity: 25,300 gallons, each.

(f) Twenty-four (24) closed fermenters, collectively known as EU-22, exhausted to S-202, collectively exhausted to one (1) ethanol scrubber, installed prior to 1950, estimated capacity: 55,000 gallons, each.

(g) Two (2) beer wells #1 and #3, known as EU-23 and EU-24, respectively, exhausted to S-203 and S-204 respectively, installed prior to 1950, estimated capacity: 38,886 and 102,098 gallons, respectively.

(h) Three (3) beer stills, collectively known as EU-25, exhausted to S-205, installed prior to 1950:

(1) Still #25, estimated capacity: 4,600 gallons per hour,

(2) Still #26, estimated capacity: 14,600 gallons per hour; and

(3) Still #31, estimated capacity: 12,000 gallons per hour.

(i) Two (2) column & kettles, collectively known as EU-26, exhausted to S-206, installed prior to 1950, estimated capacity: 727 proof gallons per hour, each.

(j) Three (3) gin stills #10, #22, and #23, collectively known as EU-27, exhausted to S-207, installed prior to 1950, estimated capacity: 600 proof gallons per hour, each.

(k) One (1) doubler still, known as EU-29, exhausted to stack S-209, installed prior to 1950, estimated capacity: 672 proof gallons per hour.

(l) Three (3) multi-column stills and five (5) distillation columns, known as EU-20 installed prior to 1950, consists of the following:

(1) spirits still V-2, exhausted to S-210, estimated capacity: 583 proof gallons per hour,

(2) spirits still V-3, exhausted to S-210, estimated capacity: 750 proof gallons per hour,

(3) spirits still V-15, exhausted to S-210, estimated capacity: 3,750 proof gallons per hour;

(4) one (1) distillation column, exhausted to S-211, and

(5) four (4) unused distillation columns, exhausted to S-211.

(m) Four (4) paddle screens, collectively known as EU-31, installed prior to 1950, exhausted to S-301, estimated capacity: 56,000 pounds per hour, each.

(n) Five (5) rotary dryers, one (1) cooler and one (1) transport system, known as EU-32 installed prior to 1950, consists of the following:

(1) Two (2) rotary dryers, exhausted to S-305 and S-306, each controlled by a wet scrubber, estimated capacity: 25,500 pound per hour, each,

(2) Three (3) rotary dryers, exhausted to S-307 through S-309, each controlled by a wet scrubber, estimated capacity: 14,500 pounds per hour, each; and

(3) One (1) cooler and one (1) transport system, controlled by a cyclone, exhausted to S-310, estimated capacity: 6.5 tons per hour.

(o) EU-33 installed prior to 1950, consists of the following:

(1) Three (3) conveyors, exhausted to S-302-S-304, estimated capacity: 38,000 pounds per hour, each.

(p) One (1) DDG (Distillers Dried Grain) loadout system, installed in 1997 consists of the following:

(1) Two (2) storage silos, estimated capacity: 13,100 cubic feet, each and two (2) surge hoppers, estimated capacity: 7.0 tons per hour, each, known as, EU-34, equipped with two (2) dust collectors exhausted to S-341 - S-344.

(2) One (1) air transport system and scale to the rail car loading area, known as EU-35, controlled by a dust collector, exhausted to S-350, estimated capacity: 7.0 tons per hour.

(3) One (1) air transport system and scale to the truck loading area, known as EU-36, controlled by a dust collector, exhausted to S-360, estimated capacity: 7.0 tons per hour.

(4) One (1) rail car loader, known as EU-37, exhausted to S-370, estimated capacity: 7.0 tons per hour.

(5) One (1) truck loader, known as EU-38, exhausted to S-380, estimated capacity: 7.0 tons per hour.

(6) One (1) old DDG loader, known as EU-39, exhausted to S-111, estimated capacity:

7.0 tons per hour.

(q) One (1) wine room, known as EU-41, consisting of thirty-five (35) tanks, installed prior to 1950, exhausted to S-410, estimated capacity: 467,517 gallons of ethanol, total.

(r) One (1) tank farm, known as EU-42, consisting of nine (9) tanks, installed prior to 1950, exhausted to S-420, estimated capacity: 750,000 gallons of ethanol, each.

(s) One (1) Bldg 88, known as EU-43, consisting of twenty-seven (27) tanks and, installed in 1989, exhausted to S-430, estimated capacity: 489,250 gallons of ethanol, total and one (1) rum handling, installed in 1997, exhausted to the atmosphere, estimated capacity: 3,501,429 gallons of rum.

(t) One (1) regauge tank area, known as EU-44, consisting of forty-seven (47) tanks, installed in 1960, exhausted to S-440, estimated capacity: 445,858 gallons of ethanol, total.

(u) One (1) mini tank farm, known as EU-45, to consist of nine (9) tanks, seven tanks installed in 1989, exhausted to S-435, estimated capacity: 779,800 gallons of ethanol, total, two (2) gin storage tanks, installed in 1997, estimated capacity: 113,800 gallons of gin, each.

(v) One (1) bottling tank room, known as EU-51, consisting of forty-one (41) tanks, installed in 1969, exhausted to S-510, estimated capacity: 412,000 gallons of ethanol, total.

(w) Seven (7) bottling lines, known as EU-52, installed prior to 1950, exhausted to S-520, estimated capacity: 7,264 cases per hour.

(x) One (1) cooler operation, known as EU-53, installed prior to 1988, exhausted to S-530, estimated capacity: 2,187 cases per hour.

(y) One (1) Warehouse C, known as EU-71, installed prior to 1950, exhausted to S-701, estimated capacity: 69,306 barrels.

(z) One (1) Warehouse E, known as EU-72, installed prior to 1950, exhausted to S-702, estimated capacity: 101,032 barrels.

(aa) One (1) Warehouse G, known as EU-73, installed prior to 1950, exhausted to S-703, estimated capacity: 84,097 barrels.

(bb) One (1) Warehouse J & M, known as EU-74, installed prior to 1950, exhausted to S-704, estimated capacity: 100,000 barrels.

(cc) One (1) Warehouse L, known as EU-75, installed prior to 1950, exhausted to S-705, estimated capacity: 93,438 barrels.

(dd) One (1) Warehouse N, known as EU-76, installed prior to 1950, exhausted to S-706, estimated capacity: 93,405 barrels.

(ee) One (1) ~~coal fired~~ steam boiler, known as EU-96, using coal, CBAF, natural gas, fuel oil #6, and/or wood, installed in 1977, exhausted to S-906, equipped with an electrostatic precipitator for particulate matter control, rated at 244 million British thermal units per hour.

(ff) One (1) natural gas fired steam boiler, known as EU-97 using fuel oil #2 as back-up, installed in 1992, exhausted to S-907, rated at 47.6 million British thermal units per hour using natural gas and 45.6 million British thermal units using fuel oil #2.

Response 1:

The capacities listed in the emission unit descriptions of Condition A.2 and Sections D.1 through D.4 are required to be in the Part 70 Operating Permit in order for IDEM, OAQ to completely assess the source's potential to emit as well as determine how much the potential to emit of the source increases in any future modifications to existing permitted equipment. The process specific emissions limitations identified in Section D of the permit are often determined from this information. The capacity stated in the emission units descriptions are not enforceable conditions and are not true emissions limitations. Condition A.2 does not impose any type of emission limit on the facilities based on hourly throughputs.

Item (ee) of Condition A.2 and Section D.3 has been revised as follows:

(ee) One (1) ~~coal fired~~ steam boiler, known as EU-96, using **coal,** CBAF, natural gas, fuel oil #6, and**/or** wood, installed in 1977, exhausted to S-906, equipped with an electrostatic precipitator for particulate matter control, rated at 244 million British thermal units per hour.

Comment 2:

Condition A.3 – Specifically Regulated Insignificant Activities – For the reasons set forth in Comment No. 31, the grinding and machining operations are not subject to 326 IAC 6-1. Therefore, these operations are not "specifically regulated insignificant activities," and Condition A.3 should be modified as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
This stationary source also includes no ~~the following~~ insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21).~~:~~

~~Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-1]~~

Response 2:

Pernod Ricard USA, Seagram Lawrenceburg Distillery acknowledges that certain facilities at the source are specifically cited in 326 IAC 6-1-8.1 and subject to the emission limitations specified in that rule. With regard to the remaining facilities at the source which are not specifically listed in 326 IAC 6-1-8.1, 326 IAC 6-1-2(a) is then applicable if the total source's potential to emit is greater than one hundred (100) tons per year of PM. The rule has been abstracted as follows with emphasis added with underlining:

326 IAC 6-1-1 Applicability

(a) Except as provided in subsections (b) through (c), sources or facilities located in the counties of Clark, Dearborn, Dubois, Howard, Lake, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne

shall comply with:

(1) the limitations in sections 8.1 through 18 of this rule, if the source or facility is specifically listed in sections 8.1 through 18 of this rule; or

(2) the limitations of section 2 of this rule, if the source or facility is not specifically listed in sections 8.1 through 18 of this rule, but has the potential to emit one hundred (100) tons or more, has actual emissions of ten (10) tons or more, of particulate matter per year.

326 IAC 6-1-2 Particulate emission limitations; fuel combustion steam generators, asphalt concrete plant, grain elevators, foundries, mineral aggregate operations; modification by commissioner

(a) Particulate matter emissions from facilities constructed after applicable dates in subsections (c) and (d) or not limited by subsections (b), (e), (f), or (g) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

(b) Fuel combustion steam generators are limited to the following particulate matter emissions limitations:

(1) For solid fuel-fired generators:

(A) that have greater than sixty-three million (63,000,000) kilo-calories (kcal) per hour heat input (two hundred fifty million (250,000,000) Btu), a particulate matter content of no greater than eighteen-hundredths (0.18) gram per million calories (one-tenth (0.10) pound per million Btu);

(B) that have equal to or greater than six million three hundred thousand (6,300,000) kcal per hour heat input, but less than or equal to sixty-three million (63,000,000) kcal per hour heat input (equal to or greater than twenty-five million (25,000,000) Btu, but less than or equal to two hundred fifty million (250,000,000) Btu), a particulate matter content of no greater than sixty-three hundredths (0.63) gram per million calories (thirty-five hundredths (0.35) pound per million Btu); or

(C) that have less than six million three hundred thousand (6,300,000) kcal per hour heat input (twenty-five million (25,000,000) Btu), a particulate matter content of no greater than one and eight-hundredths (1.08) grams per million calories (six-tenths (0.6) pound per million Btu).

(2) For all liquid fuel-fired steam generators, a particulate matter content of no greater than twenty-seven hundredths (0.27) gram per million kcal (fifteen-hundredths (0.15) pound per million Btu).

(3) For all gaseous fuel-fired steam generators, a particulate matter content of no greater than one-hundredth (0.01) grain per dry standard cubic foot (dscf).

IDEM, OAQ interprets the rule to state that if the source is subject to 326 IAC 6-1 because either facilities of the source are specifically listed and/or the source has a potential to emit greater than one hundred (100) tons per year of PM or has actual total source emissions of PM of greater than ten (10) tons per year. Since the potential to emit PM from Seagram Pernod Ricard USA, Seagram Lawrenceburg Distillery exceeds one hundred (100) tons per year and actual also exceed ten (10) tons per year, 326 IAC 6-1 and 326 IAC 6-1-8.1 apply to the source as well as all facilities including those that the Part 70 Operating permit designates as insignificant activities. Therefore, 326 IAC 6-1-1 is

applicable to the insignificant activities at this source that were specifically cited, i.e., grinding and machining operations. Thus, no changes to the proposed permit are required.

Comment 3:

Condition C.11 – Compliance Monitoring – Seagram requests additional time to install any required gauges because the next planned outage is in August which is farther away than the 180 days referenced in the compliance monitoring condition. Seagram requests that the permit be modified to allow longer extensions than ninety days to allow it to use its scheduled outage for installing gauges. Accordingly, Seagram requests that Condition C.11 be modified as follows:

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented at the next scheduled outage, but no later than December 31, 2002 ~~within ninety (90) days of permit issuance~~. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. ~~If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:~~

~~Indiana Department of Environmental Management~~
~~Compliance Branch, Office of Air Quality~~
~~100 North Senate Avenue, P. O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.~~

~~The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.~~

Response 3:

Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V permit program.

Ninety (90) days is believed to be adequate to install any required monitoring equipment that is not already present. Note that this refers only to monitoring equipment, such as a pressure drop gauge, not to control equipment. The condition also contains a provision that, if due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days by notifying IDEM. Therefore, there is no change to this proposed condition.

Comment 4:

Condition C.12 – Maintenance of Emission Monitoring Equipment – This condition should be deleted because Seagram operates a continuous opacity monitor and the monitoring of that piece of equipment is regulated under Condition C.13. Accordingly, Seagram requests that Condition C.12 be deleted as

follows:

~~C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]~~

~~(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.~~

~~(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.~~

Response 4:

Condition C.12 is retained because other emission monitoring equipment is specified in Section D.1, specifically the requirement in Condition D.1.7 to measure the pressure drop across each baghouse.

Comment 5:

Condition C.13 – Maintenance of Operating Permit – Seagram requests that Condition C.13(b) and (d) not require Method 9 opacity monitoring for one hour every four hours when the continuous opacity monitor is down. This requirement makes no sense for Seagram's operation. Seagram operates under coal and natural gas so if there is an emissions problem it can convert to natural gas. It would be sufficient for an operator to conduct a Method 9 reading once every four hours for six minutes to determine if the opacity is excessive, and if so, address the opacity. Requiring an operator to stand outside for the additional 54 minutes when there is no opacity simply makes no sense and is an undue burden. Accordingly, Seagram requests that Condition C.13(b) and (d) be modified as follows:

C.13 Maintenance of Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the continuous opacity monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

(b) Whenever the continuous opacity monitor is malfunctioning or will be down for repairs or adjustments for a period of four (4) hours or more, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of once ~~one (1) hour beginning four (4) hours~~ after the start of the malfunction or down time.

~~(c) If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight.~~

(c)~~(d)~~ Method 9 opacity readings shall be repeated for a minimum of ~~one (1) hour at least~~ once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.

(d)~~(e)~~ The opacity readings during this period shall be reported in the quarterly Compliance

Monitoring Reports, unless there are ANY observed six minute averaged exceedances, in which case, these shall be reported to the air compliance inspector within four (4) working hours.

(e)~~(f)~~ The Permittee shall install, calibrate, quality assure, and operate all necessary opacity monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

Response 5:

The purpose of the Part 70 Operating Permit program is to assure continuous compliance with all pollutant emission limitations and rules. Therefore, method 9 manual observations for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time, and repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation, is considered reasonable for an emission unit with an applicable requirement to continuously monitor compliance. This is not continuous manual observations; it is a relaxation compared to four (4) one-hour observations every four (4) hours. Furthermore for example, if the malfunction or downtime is three (3) days long, once in three (3) days is not adequate to show continuous compliance.

A back-up continuous opacity monitor can be installed in lieu of visible emission notations if the primary continuous opacity monitor fails. The source would need to request such a modification of IDEM, OAQ prior to such a modification being implemented.

Therefore, no change has been made to the proposed permit.

Comment 6:

Condition C.17 – Risk Management Plan – This condition should include a sentence indicating that the Risk Management Plan requirements do not currently apply to the Seagram operations. Seagram currently does not contain at its source a regulated substance in more than a threshold quantity, and therefore this provision does not apply. Seagram requests that the permit specifically indicate that ethanol is not covered by this requirement, and that at the time of the permit issuance no Risk Management Plan requirements are applicable based on the information contained in the application. Accordingly, Seagram requests that Condition C.17 be modified as follows:

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

Based on the application, these requirements do not apply to Seagram at the time of permit issuance. The Risk Management Plan requirements under 40 CFR 68 do not include ethanol as a regulated substance subject to that part. All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response 6:

The Risk Management Plan provision in Condition C.17 does not state that the Permittee has more than the threshold quantity of a regulated substance. The plan must be submitted if the Permittee may meet the threshold at some time in the future. However, IDEM, OAQ has noted that at the time of this review, this requirement is not applicable. Thus the proposed condition remains unchanged.

Comment 7:

Condition C.18 – Compliance Monitoring Plan – Seagram does not fundamentally object to the requirements of this condition, but believes that any compliance monitoring provision must be reasonable, and believes that this provision goes beyond IDEM's jurisdiction. Seagram reserves its right to contest the validity of this provision in any future forum if reasonable compliance monitoring provisions are not defined in the D. sections. Specific comments on the proposed compliance monitoring conditions are set out in the relevant D. sections.

Response 7:

Condition C.18 has been reorganized to clarify its intent. Paragraph (a) states the source is required to prepare a Compliance Response Plan (CRP). Paragraph (b) requires the source to implement the CRP. In paragraph (c)(2) of Condition C.18, now renamed Compliance Response Plan - Preparation, Implementation, Records, and Reports, "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or record keeping requirements may now be approved as minor permit modifications. References to this condition throughout the proposed permit have been revised to reflect the name change of this condition. Paragraph (d) clarifies that corrective action does not automatically excuse a deviation. Paragraph (e) defines the record keeping requirements. Paragraph (f) clarifies when monitoring is required. The title of this condition has been changed throughout the proposed permit.

All comments made regarding the compliance monitoring requirements in reference to any conditions in Section D are addressed in the response to that comment. The changes are as follows:

C.18 Compliance Response Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to **prepare** ~~implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

~~(1) This condition;~~

~~(2) The Compliance Determination Requirements in Section D of this permit;~~

~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~

~~(4) The Record Keeping and Reporting Requirements in Section C (General Record~~

~~Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

~~(5) A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **A** CRP~~'s~~ shall be submitted to IDEM, OAQ upon request ~~and shall be subject to review and approval by IDEM, OAQ~~. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, **supplemented from time to time by the Permittee**, ~~and~~ maintained on site, and ~~is~~ comprised of:

~~(A)~~**(1)** Reasonable response steps that may be implemented in the event that ~~compliance related information indicates that~~ a response step is needed pursuant to the requirements of Section D of this permit; and **an expected timeframe for taking reasonable response steps**.

~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that~~ prompt action

was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **minor permit modification** to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

~~(d)~~**(e)** ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

~~(e)~~**(f)** **Except as otherwise provided by a rule or provided specifically in Section D,** all monitoring **as** required in Section D shall be performed ~~at all times~~ **when** the ~~equipment~~ **emission unit** is operating, **except for time necessary to perform quality assurance and maintenance activities.** ~~If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~

~~(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

Comment 8:

Condition D.1.1(b) – PSD Minor Limit – This condition should be deleted because there is no requirement to limit raw material throughput to the corn receiving and storage system in order to make the PSD provisions not applicable. There is no basis for including a throughput limitation as contained in Condition D.1.1(b). Several reasons support this conclusion. First, the existing limit for EU-12 is 6.22 tons of PM_{10} per year which is well below the PSD permitting threshold, and therefore this throughput limit is not necessary to verify that emissions are below that threshold. In addition, there exist various exemptions under PSD, including increases in production, which would be allowable at certain times in the future and would not trigger PSD. This condition appears to eliminate the availability of any such exemptions and it is unnecessary because PSD rules stand for themselves. Condition D.1.1(b) should be deleted, and the corresponding reporting form should also be deleted, as follows:

~~(b) The amount of raw material throughput to EU-12 shall be limited to 1,492,487 tons of raw materials per twelve (12) consecutive month period, equivalent to 6.22 tons of particulate~~

~~matter (PM) and PM_{10} per year. Compliance with this limit makes the provisions of 326 IAC 2-2 not applicable.~~

Response 8:

Since Condition D.1.1(a) cites pound per hour emission limitations for PM and PM_{10} for the various facilities that comprise EU-12, the raw material throughput limit for EU-12 is not necessary in order to show compliance with the annual PM and PM_{10} emission limits which render the requirements of 326 IAC 2-2 not applicable. Therefore, Conditions D.1.1(b), D.1.16(a) and D.1.17 of the proposed permit and the quarterly report form have been deleted as follows:

D.1.1 PSD Minor Limit [326 IAC 2-2]

~~(a)~~ Pursuant to CP 029-6331-00005, issued March 14, 1997, the particulate matter (PM) and PM_{10} emissions from:

(**a**~~1~~) The corn truck unloading hopper, grain receiving elevator and conveyor, corn storage silo, and grain cleaner (part of EU-12) shall not exceed 1.20 pounds per hour, equivalent to 5.26 tons per twelve (12) consecutive month period.

(**b**~~2~~) The grain air transport system in EU-12 shall not exceed 0.219 pounds per hour, equivalent to 0.959 tons per twelve (12) consecutive month period.

(**c**~~3~~) EU-34 shall not exceed 0.136 pounds per hour, equivalent to 0.596 tons per twelve (12) consecutive month period.

(**d**~~4~~) EU-35 and EU-36 shall not exceed 0.289 pounds per hour total, equivalent to 1.27 tons per twelve (12) consecutive month period.

(**e**~~5~~) EU-37 and EU-38 shall not exceed a total of 1.25 pounds per hour, equivalent to 5.48 tons per twelve (12) consecutive month period.

Compliance with these limits makes the provisions of 326 IAC 2-2 not applicable.

~~(b) The amount of raw material throughput to EU-12 shall be limited to 1,492,487 tons of raw materials per twelve (12) consecutive month period, equivalent to 6.22 tons of particulate matter (PM) and PM_{10} per year. Compliance with this limit makes the provisions of 326 IAC 2-2 not applicable.~~

D.1.16 Record Keeping Requirements

~~(a) To document compliance with Condition D.1.1(b), the Permittee shall maintain records of the raw material throughput to EU-12 on a monthly basis.~~

~~D.1.17 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.1.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Joseph E. Seagram & Sons, Inc.
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Mailing Address: P.O. Box 7, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T 029-6929-00005
Facility: EU-12
Parameter: Raw Material Throughput
Limit: 1,492,487 tons per twelve (12) consecutive month period equivalent to 6.22 tons of PM per year.

YEAR: _____

Month	Raw Material (tons)	Raw Material (tons)	Raw Material (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Comment 9:

Condition D.1.3 – Particulate Matter – This condition should be deleted because this emission limit does not apply to any of the referenced emission units. Condition D.1.3 seeks to impose a particulate matter emission limit of 0.03 grains per dry standard cubic foot on EU-11, EU-12, EU-13, EU-14, EU-32, EU-34, EU-35, EU-36, EU-37, EU-38, and EU-39, on the basis of 326 IAC 6-1-2. However, 326 IAC 6-1 does not apply to any of these units because the potential to emit of each unit is less than 100 tons per year particulate matter and each unit has actual particulate matter emissions of less than 10 tons per year. Specifically, 326 IAC 6-1-2 only applies to units that fall within the applicability section contained in 326 IAC 6-1-1. That provision states:

Sources or facilities specifically listed in section 7 of this rule shall comply with the limitations contained therein. *Sources or facilities that* are:

(1) located in the counties listed in section 7 of this rule;

(2) but which sources or facilities are not specifically listed in section of this rule; and

(3) have the potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter per year; shall comply with the limitations of *section 2* of this rule. . . .

326 IAC 6-1 (emphasis added). This rule specifically lists certain units, such as Seagram's boiler number 6 which is listed at 326 IAC 6-1-8.1, and applies specific emission limits. For other units that are located in the counties identified in 326 IAC 6-1-7, 326 IAC 6-1-2 applies only if the units have actual emissions of greater than ten tons per year particulate matter or potential emissions of greater than 100 tons per year particulate matter. Other units with smaller emissions are subject to the process weight rule, 326 IAC 6-3. This analysis is confirmed by Construction Permit No. CP-029-6331-00005, Operating Condition No. 7, issued on March 14, 1997, which states that the specific limits applicable to EU-12 (contained in proposed Condition D.1.1) "demonstrate compliance with 326 IAC 6-3-2." Since none of the units referenced in this condition have particulate matter emission limits in excess of the thresholds, 326 IAC 6-1 does not apply. Accordingly, Condition D.1.3 should be deleted as follows:

~~D.1.3 Particulate Matter (PM) [326 IAC 6-1]~~

~~Pursuant to 326 IAC 6-1 (Nonattainment area limitations), the allowable particulate matter (PM) emission rates shall not exceed 0.03 grains per dry standard cubic foot of outlet air from EU-11 through EU-14, EU-32 and EU-34 through EU-39.~~

Response 9:

IDEM, OAQ has determined that 326 IAC 6-1 is applicable to all facilities at a source if the potential to emit PM of the entire source is greater than one hundred (100) tons per year. Therefore, Condition D.1.3 has been retained since Stacks S-103,S-104, S-111 and S-112, S-305 - S-310, S-341 - S-344, S-350, S-360, S-370, and S-380 are subject to the requirements of 326 IAC 6-1. Also see Response 2.

Comment 10:

Condition D.1.4 – Preventive Maintenance Plan – All references to the control device for EU-22 should be deleted since that scrubber was installed voluntarily and is not necessary for compliance. EU-22

consists of twenty-seven 52,000 gallon fermenting vessels. The scrubber on EU-22 is not necessary for compliance with any particulate limit. It was installed voluntarily to remove entrained alcohol in the carbon dioxide so that the carbon dioxide would become usable at a CO_2 liquification plant. It is not necessary for particulate or VOC compliance. It was voluntarily installed, and there is no basis for requiring a preventative maintenance plan.

Further, and even more importantly, all references to monitoring the parameters for this scrubber should be deleted, and any requirement that the fermenters be shut down if the scrubber is not operating should be deleted because the fermenters cannot reasonably be shut down and the scrubber is not necessary for maintaining compliance. Therefore, Condition D.1.4 should be modified as follows:

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the control devices for EU-11, 12, ~~22,~~ **and** 31 - 38.

Response 10:

Since there are no requirements to control or limit VOC emissions for EU-22 and in response to Comments 15 - 18 all of the compliance monitoring requirements for EU-22 have been deleted, therefore, the requirement for a Preventive Maintenance Plan has also been deleted as follows:

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the control devices for EU-11, 12, ~~22~~ and 31 - 38.

Comment 11:

Condition D.1.6(a) – Visible Emission Notations – This requirement should be conducted daily rather than once per shift because that frequency is sufficient to ensure that the control devices are working for these various stacks and once per shift is more frequent than called for based on the low emission levels of most of the emission units. Once per shift is unduly burdensome for visible emission notations. The equipment referenced is transferred from silo bins automatically. No staffing exists in off-shifts and weekends because the operations are done automatically, and persons would be required to be hired merely to perform this function. Any conceivable environmental benefit for this frequency does not justify this burden. Accordingly, Condition D.1.6(a) should be modified as follows:

D.1.6 Visible Emissions Notations

(a) Visible emission notations of the EU-11, 12, 32, 34 - 38 stack exhausts S-103, S-111, S-112, S-305 through S-310, S-341 through S-343, S-350, S-360, S-370 and S-380 shall be performed once per day ~~shift~~ during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Response 11:

Condition D.1.6 which requires visible emissions notation once per shift has not been relaxed to daily since compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. The OAQ believes that visible emissions notations once per operating shift are a reasonable requirement. Therefore no change is required to this condition.

Comment 12:

Condition D.1.7 – Baghouse Parametric Monitoring – The parametric monitoring should be done once daily rather than once per shift because that frequency is sufficient to ensure proper operations of the baghouses and is sufficient for the relatively low emissions of these various emission units. Once per shift is unduly burdensome for visible emission notations. The equipment referenced is transferred from silo bins automatically. No staffing exists in off-shifts and weekends because the operations are done automatically, and persons would be required to be hired merely to perform this function. Any conceivable environmental benefit for this frequency does not justify this burden. Accordingly, Condition D.1.7 should be modified as follows:

D.1.7 Baghouse Parametric Monitoring

The Permittee shall record the total static pressure drop across each baghouse used in conjunction with the EU-11, 12, 34, 35 and 36, at least once per day ~~shift~~ when these processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 and 5.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure readings are outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Response 12:

Condition D.1.7 which requires parametric monitoring once per shift has not been relaxed to daily since compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. The OAQ believes that parametric monitoring once per operating shift is a reasonable requirement. Therefore no change is required to this condition.

Comment 13:

Condition D.1.8 – Baghouse Inspections – Seagram requests that this condition require inspections twice per year rather than each calendar quarter. This results from the fact that Seagram shuts down its plant one time during the summer and over Christmas and would presumably do these baghouse inspections during those times, and a twice per year frequency would be sufficient to ensure optimum performance of the baghouses. In addition, Seagram does not direct any vents internally and therefore references to redirecting vents to the atmosphere should be deleted. Also, there is a typographical error (an extra period) at the end of the last sentence. Accordingly, Condition D.1.8 should be modified as follows:

D.1.8 Baghouse Inspections

An inspection shall be performed twice per year ~~each calender quarter~~ of all bags controlling EU-11, 12, 34, 35 and 36 when venting to the atmosphere. ~~A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.~~ All defective bags shall be replaced.

Response 13:

The purpose of the Part 70 Operating Permit program is to assure continuous compliance with all

pollutant emission limitations and rules. Since the parametric monitoring will be conducted once per shift to ensure continuous compliance, the baghouse inspections can be performed during scheduled plant shutdown at least twice per year, approximately six (6) months a part.

The instructions are provided for what the source needs to do if the vents are redirected to the atmosphere, assuming that they are first redirected inside the building at sometime in the future.

The extra period at the end of Condition D.1.8 has been deleted and the change to semi-annual inspections is as follows:

D.1.8 Baghouse Inspections

An inspection shall be performed **semi-annually** ~~each calender quarter~~ of all bags controlling EU-11, 12, 34, 35 and 36 when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and **semi-annually** ~~every three (3) months~~ thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced. ~~.~~

Comment 14:

Condition D.1.9 – Broken or Failed Bag Detection – This provision should allow continued operation if the units are in compliance with the applicable requirements. Accordingly, Condition D.1.9 should be modified as follows:

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the unit is in compliance with applicable requirements or there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the unit is in compliance with applicable requirements or the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Response 14:

Pursuant to 326 IAC 2-7-5(1)(F), each Part 70 Operating Permit is required to contain conditions which minimize excess emissions, to the extent feasible, caused by events such as a bag failure. The requirements take into consideration available technologies, safety cost, and other relevant factors. The OAQ does not consider shutting down the baghouse and associated production equipment to be infeasible.

A bag failure may qualify as an "emergency" as defined in Condition B.12 for purposes of an affirmative defense against a violation of the specific permit condition. However, once the bag failure is observed, continuing to operate the equipment and venting uncontrolled particulate matter to the atmosphere may not be considered an attempt by the Permittee to take all reasonable steps to minimize levels of emissions that may exceed an emission standard or other requirement in the permit.

Therefore, the OAQ believes that the requirement to shutdown the affected compartments is a reasonable action to ensure compliance with the particulate matter limitations. Also, applicability of the emergency provisions of 326 IAC 2-7-16 will be determined on a fact specific basis if necessary. Condition D.1.9 addresses what actions a Permittee must take when bag failure is observed.

Furthermore, it is not possible to determine compliance with applicable conditions, including the allowable PM emission rates pursuant to 326 IAC 6-1, if the bag has failed without continuous emissions monitoring.

Condition D.1.9 has been clarified as follows for single compartment baghouses to state that if a failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, **if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows,** failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Comment 15:

Condition D.1.10 – Scrubber Parametric Monitoring – References to the scrubber for the fermenters, EU-22, should be deleted because the scrubber was installed voluntarily and is not designed for particulate emission control. As discussed above under Comment No. 10, the scrubber for the fermenters should not be regulated by this permit because it was installed voluntarily and is not

designed for particulate emission control. Accordingly, Condition D.1.10 should be modified as follows:

D.1.10 Scrubber Parametric Monitoring

The Permittee shall record the total static pressure drop across the scrubbers used in conjunction with EU-32 ~~and EU-22~~ at least once per day when these processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the scrubbers shall be maintained within the range of 0.5 to 6.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure readings are outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Comment 16:

Condition D.1.11 – Liquor Flow Rate – This condition should be modified to be monitored once per day rather than once per shift. In addition, references to the scrubber for the fermenters, EU-22, should be deleted because that scrubber was installed voluntarily and is not designed for particulate emission control. As discussed above under Comment No. 10, the scrubber for the fermenters should not be regulated by this permit because it was installed voluntarily and is not designed for particulate emission control. Accordingly, Condition D.1.11 should be modified as follows:

D.1.11 Liquor Flow Rate

The Permittee shall record the flow rate scrubbing liquor used in conjunction with the dryers, EU-32, ~~and the fermenters, EU-22,~~ at least once per <u>day</u> ~~shift~~ when these emission units are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the liquor flow rate shall be maintained at a minimum flow of 4.0 gallons per minute for the nozzles and 10 gallons per minute for the trays for scrubbers exhausted to stacks S-305 and S-306 as well as at a minimum flow of 3.0 gallons per minute for the nozzles and 7.0 gallons per minute for the trays for scrubbers exhausted to stacks S-307 through S-309 or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure readings are outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Comment 17:

Condition D.1.12 – Scrubber Inspections – Seagram requests that scrubber inspections be conducted twice per year rather than each quarter, because it has two outages per year at which time it could conduct proper inspections. In addition, the only scrubbers that should be monitored are those scrubbers associated with EU-32 because the scrubber for the fermenters was voluntarily installed and is not designed for particulate removal, and therefore should not be subject to regulation under this permit. *See* Comment No. 10. Scrubber inspections twice per year should be sufficient to ensure proper operation and would be consistent with the outage schedule. Seagram is required to take down its equipment in order to inspect its scrubbers and twice per year frequency (during outages) should

be sufficient. Accordingly, Condition D.1.12 should be modified as follows:

D.1.12 Scrubber Inspections

An inspection shall be performed twice per year ~~each calendar quarter~~ of the scrubbers for EU-32 ~~scrubbers~~. Defective scrubber parts shall be replaced. A record shall be kept of the results of the inspection.

Comment 18:

Condition D.1.13 – Failure Detection – This condition related to shutting down equipment when a scrubber failure occurs should be limited to the scrubbers for EU-32 and not the scrubber for the fermenters, EU-22. The scrubber for the fermenters, EU-22, was installed voluntarily and is not designed for particulate emissions reductions, and therefore should not be regulated by the permit. *See* Comment No. 10. In addition, it would be virtually impossible to shut down fermenting operations if a scrubber failure occurred, and no useful purpose would be gained anyway. Accordingly, Condition D.1.13 should be modified as follows:

D.1.13 Failure Detection

In the event that a scrubber failure for EU-32 has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C).

Responses 15 - 18:

The requested changes to semi-annual from quarterly inspections and daily rather than once per shift parametric monitoring for the scrubbers is similar to the request to change the baghouse compliance monitoring requirements. See Responses 12 and 13. In addition, the frequency of compliance monitoring in Condition D.1.10 has been changed from once per day to once per shift for EU-32 and to be consistent with the record keeping requirements of Condition D.1.16(e).

Conditions D.1.10 through D.1.13 have been revised to delete reference to EU-22 because the scrubber was installed prior to 1950 and does not have to be operated at all times in order to comply with any State or Federal rules. Therefore, the scrubber parametric monitoring, liquor flow rate, scrubber inspections and failure detections have been changed as follows:

Condition D.1.13 has been clarified as follows for scrubbers to state that if a failure is indicated by a significant drop in the scrubber's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if scrubber failure is determined by other means, such as, flow rates, air infiltration, leaks, or pH, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. In addition, the reference to Emergency Provision in Condition D.1.13 has been changed from Section C to Section B as follows:

D.1.10 Scrubber Parametric Monitoring

The Permittee shall record the total static pressure drop across the scrubbers used in conjunction with EU-32 ~~and EU-22~~ at least once per **shift** ~~day~~ when these processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the scrubbers shall be maintained within the range of 0.5 to 6.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure

readings are outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.11 Liquor Flow Rate

The Permittee shall record the flow rate scrubbing liquor used in conjunction with the dryers, EU-32, ~~and the fermenters, EU-22,~~ at least once per shift when these emission units are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the liquor flow rate shall be maintained at a minimum flow of 4.0 gallons per minute for the nozzles and 10 gallons per minute for the trays for scrubbers exhausted to stacks S-305 and S-306 as well as at a minimum flow of 3.0 gallons per minute for the nozzles and 7.0 gallons per minute for the trays for scrubbers exhausted to stacks S-307 through S-309 or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure readings are outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports** shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.12 Scrubber Inspections

An inspection shall be performed **semi-annually** ~~each calendar quarter~~ of the scrubbers **for EU-32**. Defective scrubber parts shall be replaced. A record shall be kept of the results of the inspection.

D.1.13 Failure Detection

In the event that a scrubber failure **for EU-32** has been observed:

If failure is indicated by a significant drop in the scrubber's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if scrubber failure is determined by other means, such as flow rates, air infiltration, leaks, or pH, f~~F~~ailed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section **B**~~C~~).

Comment 19:

Conditions D.1.14 – Cyclone Inspections and D.1.15 – Cyclone Failure Detection – These conditions should be deleted because they are an unnecessary and pointless burden. The daily visual emissions will be sufficient to ensure that the cyclones are properly operated. Failure of the cyclones to operate properly will result in loss of product and will be fixed immediately. If such inspections are required, Seagram requests that they be conducted twice per year rather than once each quarter to coincide with its outage schedule. Conditions D.1.14 and D.1.15 should be deleted as follows:

~~D.1.14 Cyclone Inspections~~

~~An inspection shall be performed each calender quarter of all cyclones controlling the cooler and transport operation, EU-32, when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.~~

~~D.1.15 Cyclone Failure Detection~~

~~In the event that cyclone failure has been observed:~~

~~Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

Response 19:

These compliance monitoring requirements for the cyclone are similar to those for baghouses and the rationale for retention is to assure continuous compliance with the state and Federal rules and specifically the particulate matter emission limitations. Therefore, Condition D.1.14 has been changed to semi-annual inspections as follows. There are no changes required to Condition D.1.15.

D.1.14 Cyclone Inspections

An inspection shall be performed **semi-annually** ~~each calender quarter~~ of all cyclones controlling the cooler and transport operation, EU-32, when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and **semi-annually** ~~every three months~~ thereafter. Inspections are optional when venting to the indoors.

Comment 20:

Condition D.1.16 – Record Keeping Requirements – Various changes should be made to this condition. First, Condition D.1.16(a) should be deleted for the reasons set out regarding why Condition D.1.1(b) should be deleted. Second, Condition D.1.16(b) should be deleted because there is no D.1.2(a) or (b). Third, Condition D.1.16(d) should modified to be simplified similar to (e), (f), and (g). Much of the information under (d) is redundant or irrelevant, such as cleaning cycle information and inclusion of *both* the inlet and outlet differential static pressure. Condition D.1.16(d) should be worded merely "to document compliance with Condition D.1.7, the Permittee shall maintain once daily records of inlet and outlet static pressure." Conditions D.1.16(e), (f), and (g) should include daily rather than once per shift records, and references to Condition D.1.14 should be deleted. In addition, Condition D.1.16(e) and (f) should be modified to indicate that only records for the scrubber for EU-32, and not the scrubber for the fermenters (EU-22), should be required. Accordingly, Condition D.1.16 should be modified as follows:

D.1.16 Record Keeping Requirements

~~(a) To document compliance with Condition D.1.1(b), the Permittee shall maintain records of the raw material throughput to EU-12 on a monthly basis.~~

~~(b) To document compliance with Conditions D.1.2(a) and (b), the Permittee shall maintain records of the raw material throughput to EU-11 and EU-14 on a monthly basis.~~

(a)~~(c)~~ To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations daily ~~once per shift~~ of the Stack exhausts S-103, S-111, S-112, S-305 through S-310, S-341 through S-343, S-350, S-360, S-370 and S-380.

(b)~~(d)~~ To document compliance with Condition D.1.7, the Permittee shall maintain ~~the following: (1)~~ daily records of inlet and outlet static pressure.

~~(1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:~~

~~(A) Inlet and outlet differential static pressure; and~~

~~(B) Cleaning cycle: frequency and differential pressure~~

~~(2) Documentation of all response steps implemented, per event.~~

~~(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~

~~(4) Quality Assurance/Quality Control (QA/QC) procedures.~~

~~(5) Operator standard operating procedures (SOP).~~

~~(6) Manufacturer's specifications or its equivalent.~~

~~(7) Equipment "troubleshooting" contingency plan.~~

~~(8) Documentation of the dates vents are redirected.~~

(c)~~(e)~~ To document compliance with Condition D.1.10, the Permittee shall maintain daily ~~once per shift~~ records of the total static pressure drop of the scrubber~~s~~ for EU-32 during normal operation when venting to the atmosphere.

(d)~~(f)~~ To document compliance with Condition D.1.11, the Permittee shall maintain daily ~~once per shift~~ records of the liquor flow rate of the scrubber~~s~~ for EU-32 during normal operation when venting to the atmosphere.

(e)~~(g)~~ To document compliance with Conditions D.1.8~~,~~ and D.1.12 ~~and D.1.14~~ the Permittee shall maintain records of the results of the inspections required under Conditions D.1.8~~,~~ and D.1.12 ~~and D.1.14~~ and the dates the vents are redirected.

(f)~~(h)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Response 20:

Condition D.1.16(a) has been deleted because the raw material throughput limit of Condition D.1.1(b) has been deleted. See Response 8.

Condition D.1.16(b) has been deleted because there are no raw material throughput limits for EU-11 and EU-14.

Condition D.1.16(d), now D.1.16(b), has been revised to eliminate record keeping for the cleaning cycles, etc., that has been determined not to be necessary to show compliance.

Conditions D.1.16(e) and (f), now D.1.16(c) and (d), have been revised to clarify that record keeping is required for only EU-32.

Condition D.1.16(g), now D.1.16(e) has not been modified because Condition D.1.14 has not been deleted.

The condition is revised as follows:

D.1.16 Record Keeping Requirements

~~(a) To document compliance with Condition D.1.1(b), the Permittee shall maintain records of the raw material throughput to EU-12 on a monthly basis.~~

~~(b) To document compliance with Conditions D.1.2(a) and (b), the Permittee shall maintain records of the raw material throughput to EU-11 and EU-14 on a monthly basis.~~

(**a**)~~(c)~~ To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations once per shift of the Stack exhausts S-103, S-111, S-112, S-305 through S-310, S-341 through S-343, S-350, S-360, S-370 and S-380.

(**b**)~~(d)~~ To document compliance with Condition D.1.7, the Permittee shall maintain the following:

(1) ~~Once per shift~~ **R**records of the ~~following operational parameters~~ **inlet and outlet differential static pressure** during normal operation when venting to the atmosphere **once per shift**.

~~(A) Records of the Inlet and outlet differential static pressure; and~~

~~(B) Cleaning cycle: frequency and differential pressure~~

~~(2) Documentation of all response steps implemented, per event.~~

~~(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~

~~(4) Quality Assurance/Quality Control (QA/QC) procedures.~~

~~(5) Operator standard operating procedures (SOP).~~

~~(6) Manufacturer's specifications or its equivalent.~~

~~(7) Equipment "troubleshooting" contingency plan.~~

(**2**~~8~~) Documentation of the dates vents are redirected.

(c)~~(e)~~ To document compliance with Condition D.1.10, the Permittee shall maintain once per shift records of the total static pressure drop of the scrubbers **for EU-32** during normal operation when venting to the atmosphere.

(d)~~(f)~~ To document compliance with Condition D.1.11, the Permittee shall maintain once per shift records of the liquor flow rate of the scrubbers **for EU-32** during normal operation when venting to the atmosphere.

(e)~~(g)~~ To document compliance with Conditions D.1.8, D.1.12 and D.1.14 the Permittee shall maintain records of the results of the inspections required under Conditions D.1.8, D.1.12 and

D.1.14 and the dates the vents are redirected.

(**f**)~~(h)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 21:

Condition D.1.17 – Reporting Requirements – The referenced reporting requirements should be deleted for the reasons set out on why the underlying requirements should be deleted. Accordingly, Condition D.1.17 should be deleted as follows:

~~D.1.17 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.1.1(b) and D.1.2(a) and (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Response 21:

Since Condition D.1.1(b) has been deleted and Condition D.1.2(a) and (b) do not exist, Condition D.1.17 has been deleted as shown in Response 8.

Comment 22:

Condition D.2.1 – PSD – This condition related to PSD requirements for the source should be deleted as it is redundant and incorrect. This provision suggests that changes or modifications which result in emissions that exceed PSD significant levels must obtain prior approval from IDEM. This is an incorrect characterization of PSD because it eliminates the various exemptions that are available under PSD. In addition, the PSD requirements stand by themselves and cannot reasonably be summarized in one sentence. Further, this condition is redundant with Condition B.21 because that condition already states that any modification, construction, and reconstruction is governed by the Indiana state permitting rules, which include the PSD rules. Therefore, Condition D.2.1 should be deleted as follows:

~~D.2.1 PSD [326 IAC 2-2] [40 CFR 52.21]~~

~~Any change or modifications to this existing major PSD source which result in emissions that exceed the PSD Significant Levels shall obtain prior approval from IDEM, OAQ prior to making the change.~~

Response 22:

Since there are no other applicable conditions for the emission units listed in Section D.2, Condition D.2.1 has been modified as follows:

D.2.1 PSD [326 IAC 2-2] [40 CFR 52.21]

~~Any change or modifications to this existing major PSD source which result in emissions that exceed the PSD Significant Levels shall obtain prior approval from IDEM, OAQ prior to making the change.~~

The applicable requirements for these facilities are listed in Sections B and C of this permit.

Comment 23:

Condition D.3.1(b) – Particulate Matter – All references to a ton per year of coal limit should be deleted as should any required control efficiency for the electrostatic precipitator ("ESP"). The amount of coal that can be burned would depend on the heat value of the coal. In addition, the control efficiency of the ESP may or may not need to be a certain value depending on the fuel mix that is burned at the boiler. For example, the ESP should not be required to achieve 94.4% efficiency in order for natural gas to achieve compliance with the 0.180 pound per mmBtu limit. In addition, the ESP cannot be operated

when #6 fuel oil is combusted because damage to the precipitator would likely occur. Further, the ESP does not need to be operated at all when natural gas is the fuel. In addition, ESP maintenance can be performed when the unit is combusting natural gas. Accordingly, Condition D.3.1(b) should be modified as follows:

Pursuant to 326 IAC 6-1-8.1, the particulate matter emissions from steam boiler, known as EU-96, shall be limited to:

(b) ~~85,096 tons of coal per twelve (12) consecutive month period, equivalent to~~ 214.2 tons of PM per year. ~~The minimum overall PM control efficiency for the electrostatic precipitator on this boiler shall not be less than 94.4% to comply with these limit. For purposes of showing compliance with this fuel limit, the following equivalencies shall be used:~~

~~(1) One (1) million cubic feet of natural gas is equivalent to 0.021 tons of coal,~~

~~(2) One kilogallon of No. 6 fuel oil is equivalent to 0.138 tons of coal, and~~

~~(3) One (1) ton of wood is equivalent to 0.056 tons of coal.~~

Response 23:

The actual PM emission rate when burning coal is determined by an emission factor which is not dependent on the heat content of the coal as shown on page 7 of 16 in Appendix A. The amount of coal burned is a function of the heat content. The throughput limit has been retained to show compliance with the requirement of 326 IAC 6-1-8.1 to emit no more than 214.2 tons of PM per year.

The minimum control efficiency when coupled with burning only coal results in an emission rate of 214.2 tons of PM per year. Therefore, this minimum control efficiency has been assigned to the ESP when burning coal and/or wood. IDEM agrees that the minimum control efficiency does not have to be maintained for natural gas and fuel oil. Therefore, Condition D.3.1(b) has been revised as follows:

D.3.1 Particulate Matter (PM) [326 IAC 6-1-8]

Pursuant to 326 IAC 6-1-8.1, the particulate matter emissions from steam boiler, known as EU-96, shall be limited to:

(b) 85,096 tons of coal per twelve (12) consecutive month period, equivalent to 214.2 tons of PM per year. The minimum overall PM control efficiency for the electrostatic precipitator on this boiler shall not be less than 94.4% to comply with **this** ~~these~~ limit **when firing coal, CBAF, or wood**. For purposes of showing compliance with this fuel limit, the following equivalencies shall be used:

(1) One (1) million cubic feet of natural gas is equivalent to 0.021 tons of coal,

(2) One kilogallon of No. 6 fuel oil is equivalent to 0.138 tons of coal, and

(3) One (1) ton of wood is equivalent to 0.056 tons of coal.

Comment 24:

Condition D.3.6 – Particulate Matter (PM) – Seagram requests that the requirement to operate the electrostatic precipitator at all times be modified to indicate that it only should be operating when firing

coal, CBAF, or wood. The ESP cannot be operated when firing oil, and need not be operated when firing natural gas. In fact, maintenance can be done on the ESP when natural gas is fired and this does not require shutting down the boiler. Accordingly, Condition D.3.6 should be modified as follows:

D.3.6 Particulate Matter (PM)

In order to comply with Condition D.3.1, the electrostatic precipitator for PM control shall be in operation and control emissions from the steam boiler, known as EU-96, at all times that the steam boiler is in operation and is firing coal, CBAF, or wood.

Response 24:

Condition D.3.6 has been revised as follows to be consistent with Condition D.3.1(b):

D.3.6 Particulate Matter (PM)

In order to comply with Condition D.3.1, **except as otherwise provided by statute or rule or in this permit,** the electrostatic precipitator for PM control shall be in operation and control emissions from the steam boiler, known as EU-96, at all times that the steam boiler is in operation **and is firing coal, CBAF, or wood**.

Comment 25:

Condition D.3.8 – Opacity Readings – This condition should be modified to indicate that response steps are only necessary when the opacity exceeds 30%, not 20%, and also that the unit need not be shut down if the opacity exceeds 35% if the unit is taken off coal and is fired with natural gas. In addition, as discussed below, monitoring T-R set voltage should not be required, and therefore the portion of Condition D.3.8(c) relating to determining T-R set voltage should be deleted. Accordingly, Condition C.3.8(b) should be modified as follows:

D.3.8 Opacity Readings

(a) The source will operate a continuous opacity monitor pursuant to 326 IAC 3.

(b) Appropriate response steps shall be taken in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps whenever the opacity exceeds thirty ~~twenty~~ (30%) percent*. In the event of opacity exceeding thirty-five (35%) percent*, the boiler will be shut down or taken off coal and fired with natural gas, if necessary, so that T-R sets or the electrostatic precipitator can be repaired or the cause(s) leading to T-R set outages or electrostatic precipitator malfunction can be corrected.

~~(c) The instrument used for determining the T-R set voltage shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.~~

* (Other values may be used if it can be demonstrated that a higher opacity can be reached without demonstrating noncompliance with the PM limitation, but in no case rise above thirty-five (35%) percent. Response steps planned to restore T-R sets or repair the electrostatic precipitator are to be included in the Preventive Maintenance Plan.)

Response 25:

Condition D.3.8 has been revised to allow the boiler to continue to operated in the event that opacity exceeds thirty-five (35%) percent as long as the fuel is switched to natural gas. In addition the condition has been revised to require that the appropriate response steps be taken whenever the

opacity exceeds thirty (30%) percent, not 20%, since 30% is the opacity limit specified in 326 IAC 5-1-2.

The requirement to calibrate the instrument once every six (6) months is not burdensome, and therefore item (c) has been retained.

The revised condition is as follows:

D.3.8 Opacity Readings

(a) The source will operate a continuous opacity monitor pursuant to 326 IAC 3.

(b) Appropriate response steps shall be taken in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports** whenever the opacity exceeds **thirty** ~~twenty~~ (30%) percent*. In the event of opacity exceeding thirty-five (35%) percent*, the boiler will be shut down **or switched to only natural gas fuel**, if necessary, so that T-R sets or the electrostatic precipitator can be repaired or the cause(s) leading to T-R set outages or electrostatic precipitator malfunction can be corrected.

(c) The instrument used for determining the T-R set voltage shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

* (Other values may be used if it can be demonstrated that a higher opacity can be reached without demonstrating noncompliance with the PM limitation, but in no case rise above thirty-five (35%) percent. Response steps planned to restore T-R sets or repair the electrostatic precipitator are to be included in the Preventive Maintenance Plan.)

Comment 26:

Condition D.3.9 – Preventative Inspections – Seagram would commit to annual inspections, rather than once every two years, and requests that references to flue gas conditioning be deleted since there is no flue gas conditioning system, and that the various measurements under Conditions D.3.9(b) and (c) be deleted since annual inspections will be performed. Seagram takes an annual outage in which a complete inspection of its ESP occurs. This should be sufficient for these requirements, and requests that Condition D.3.9 be modified as follows:

D.3.9 Preventative Inspections

(a) The following inspections shall be performed at least once <u>every year</u> ~~every two (2) years~~ in accordance with the Preventive Maintenance Plan prepared in accordance with Section B - Preventive Maintenance Plan:

(1) Plate and electrode alignment;

(2) Electrostatic precipitator component/controller failure;

(3) Air and water infiltration;

(4) Start-up and shutdown practices;

~~(5) Flue gas conditioning;~~

(6) Spare parts availability; and

(7) Flyash conveyance.

~~(b) Plate and electrode alignment measurements shall be taken whenever there is an outage of any nature lasting more than three (3) days unless such measurements have been taken within the past six months.~~

~~(c) All other inspections shall be made whenever there is an outage of any nature lasting more than three (3) days unless such measurements have been taken within the past twelve (12) months.~~

Response 26:

Condition D.3.9 has been revised to allow Pernod Ricard USA, Seagram Lawrenceburg Distillery to perform such inspections once every twelve (12) months. "Once every year" allows for the possibility of performing inspections in January of the first year and December of the second year; thus resulting in twenty-three (23) months without an inspection. This would not have allowed item (c) to be deleted since twelve (12) months would have been exceeded. Using the wording once every twelve (12) months, allows item (c) to be deleted.

Since Seagrams does not perform flue gas conditioning, this item has been deleted as suggested.

Since the requirement to inspect every twelve (12) months does not insure that the plate and electrode alignment measurements have been taken within the past six (6) months, item (b) has been retained.

Therefore, the wording of item (a) has been changed and item (c) has been deleted as follows:

D.3.9 Preventative Inspections

(a) The following inspections shall be performed at least once every **twelve (12) months** ~~two (2) years~~ in accordance with the Preventive Maintenance Plan prepared in accordance with Section B - Preventive Maintenance Plan:

(1) Plate and electrode alignment;

(2) Electrostatic precipitator component/controller failure;

(3) Air and water infiltration;

(4) Start-up and shutdown practices;

~~(5) Flue gas conditioning;~~

(5)~~(6)~~ Spare parts availability; and

(6)~~(7)~~ Flyash conveyance.

(b) Plate and electrode alignment measurements shall be taken whenever there is an outage of any nature lasting more than three (3) days unless such measurements have been taken within the past six **(6)** months.

~~(c) All other inspections shall be made whenever there is an outage of any nature lasting more than three (3) days unless such measurements have been taken within the past twelve (12) months.~~

Comment 27:

Condition D.3.10 – Parametric Monitoring – This condition related to monitoring T-R sets should be deleted because it provides no useful information for Seagram's operations. As an initial matter, the T-R set readings may or may not be relevant depending on whether coal is being used, gas is being used, or coal-gas mixtures.

In addition, the voltage readings vary tremendously among the different fields within the ESP, and the variations are determined automatically by computers outside of the control of the operator. The ESP is a four-field unit. Generally, field 1 would have the most activity, with field 4 having the least activity, but the fields' activity would vary based on how the automatic system determines the ESP should be operating based on load, flow, temperature, etc. Monitoring T-R set readings serves absolutely no purpose.

Seagram does not monitor voltage in any manner, but instead monitors current to make sure that the electrostatic precipitator is operating. The acceptable readings would vary tremendously based on a number of factors, including fuel type and load.

Seagram proposes to monitor its opacity and if the opacity exceeds the applicable limit, then take reasonable corrective action. In addition, it would perform annual inspections of the ESPs. Condition D.3.10 should be deleted as follows:

~~D.3.10 Parametric Monitoring~~

~~(a) The ability of the electrostatic precipitator to control particulate emissions shall be monitored once per shift, when the unit is in operation, by measuring and recording the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.~~

~~(b) Appropriate response steps shall be taken in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps whenever operation is outside any of the following ranges:~~

~~(1) Primary voltage: 260 - 300 V~~

~~(2) Secondary voltage: 35 - 55 kV~~

~~(3) T-R set primary current: 50 - 75 A~~

~~(d) The instrument used for determining the T-R set voltage shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.~~

~~(e) Appropriate response steps for any discrepancies in the above list found during the inspection shall be taken in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps.~~

Response 27:

Condition D.3.10 has been retained and modified to require recording the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets with the understanding that the Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports allows for short-term, temporary excursions outside of these normal operating parameters specified in Condition D.3.10 and no response step is necessary, if operation is already returning to normal. The changes to

Condition D.3.10 are as follows:

D.3.10 Parametric Monitoring

(a) The ability of the electrostatic precipitator to control particulate emissions shall be monitored once per shift, when the unit is in operation, by measuring and recording the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.

(b) **When for any one reading, operation is outside one of the normal ranges shown below, or a range established during the latest stack test, the Permittee shall take reasonable** ~~appropriate~~ response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports** whenever operation is outside any of the following ranges. A voltage or current reading outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.

(1) Primary voltage: 260 - 300 V

(2) Secondary voltage: 35 - 55 kV

(3) T-R set primary current: 50 -75 A

(**c**~~d~~) The instrument used for determining the T-R set voltage shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

~~(e) Appropriate response steps for any discrepancies in the above list found during the inspection shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports.~~

Comment 28:

Condition D.3.11 – Record Keeping Requirements – Various changes should be made to this condition. Section (d) should be deleted since maintaining records of transformer set readings serves no purpose. Condition D.3.11 should be modified as follows:

D.3.11 Record Keeping Requirements

(a) To document compliance with Conditions D.3.1, D.3.2 and D.3.4, the Permittee shall maintain records in accordance with (1) through (11) below. Records maintained for (1) through (11) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO_2 emission limits established in Conditions D.3.1, D.3.2 and D.3.4.

(1) Calendar dates covered in the compliance determination period,

(2) Actual coal usage since last monthly compliance determination period,

(3) Sulfur content, heat content, and ash content,

(4) Sulfur dioxide emission rates,

(5) Vendor analysis of coal and coal supplier certification,

(6) Actual fuel oil usage since last compliance determination period,

(7) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used,

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

(8) Fuel supplier certifications,

(9) The name of the fuel supplier,

(10) A statement from the fuel supplier that certifies the sulfur content of the fuel oil, and

(11) Actual wood usage since last compliance determination period.

(b) To document compliance with Conditions D.3.7 and D.3.8, the Permittee shall maintain records of the continuous opacity monitor for the boiler stack S-906 exhaust while combusting coal, oil or wood

(c) To document compliance with Condition D.3.9, the Permittee shall maintain records of the following inspections and measurements:

(1) Plate and electrode alignment;

(2) Electrostatic precipitator component/controller failure;

(3) Air and water infiltration;

(4) Start-up and shutdown practices;

(5) Spare parts availability;

(6) Flyash conveyance;

(7) Plate and electrode alignment; and

(8) All other inspections.

~~(d) To document compliance with Condition D.3.10, the Permittee shall maintain records of the the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.~~

(d)~~(e)~~ The record keeping required by 326 IAC 7-4-13(3)(B) are no longer applicable since only Boiler No. 6, now known as EU-96, remains in service and Boiler 5 has been removed from the source.

326 IAC 7-4-13(3)(B) stated that if Boilers 5 and 6 are being operated at the same time, only one (1) of the boilers may use coal or fuel oil. Seagram shall maintain a record of the fuel type used at Boilers 5 and 6 in order to demonstrate compliance with the requirements of this rule. When both boilers are operating simultaneously, daily logs shall be kept. Such records shall

be made available to the department upon request. Within thirty (30) days following the end of the calendar quarter in which both Boilers 5 and 6 operated simultaneously, Seagram shall report to the department the fuels used, including daily information for each day during which both boilers operated simultaneously.

(e)~~(f)~~ The record keeping and reporting requirements for Boiler No. 5 under 326 IAC 6-1-8.1(c)(6) are no longer applicable since Boiler No. 5 has been removed from service.

326 IAC 6-1-8.1(c)(6) requires Seagram to submit quarterly reports for Boiler No. 5 and Boiler No. 6 (EU-96) that reflect the particulate matter emissions from each boiler for the prior 12 months. Since Boiler No. 5 has been removed from service, this record keeping and reporting requirement for Boiler No. 5 are no longer applicable.

(f)~~(g)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Response 28:

The recordkeeping in Condition D.3.11(d) has been retained since Condition D.3.10 has not been deleted as explained in Response 27. The extra "the" has been deleted in item (d) in the proposed Condition D.3.11 as follows:.

D.3.11 Record Keeping Requirements

(d) To document compliance with Condition D.3.10, the Permittee shall maintain records of the ~~the~~ primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.

Comment 29:

Condition D.4.1 – Particulate Matter – This condition related to particulate emissions for the natural gas-fired boiler should be deleted and replaced with the proper emission limit and reflect the proper regulation. The referenced regulation, 326 IAC 6-1-2, does not apply to this unit because the potential to emit is less than 100 tons per year, and the actual emissions are less than 10 tons per year. *See* 326 IAC 6-1-1(3). The applicable regulation is the indirect heating rule, 326 IAC 6-2. The proper emission limit and the proper regulation should be included which is set out below and is included in the existing permit (Permit No. CP-029-2159, Operation Condition No. 4):

D.4.1 Particulate Matter Limitation (PM) ~~[326 IAC 6-1-2]~~ [326 IAC 6-2]

Particulate Matter emissions from EU-97 shall comply with 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating). Particulate matter emissions from EU-97 shall be limited to actual emissions of 0.014 pounds per million Btu, which shall satisfy this rule. ~~Pursuant to 326 IAC 6-1-2(b)(5) (Particulate emission limitations), the particulate matter emissions from steam boiler, known as EU-97, shall be limited to 0.01 grains per dry standard cubic foot.~~

Response 29:

See Responses 2 and 9.

Comment 30:

Condition D.4.7(b) – Record Keeping Requirements – This provision should be re-worded to clarify that

visible emission notations are only required for periods when EU-97 is burning No. 2 fuel oil. This change would be consistent with the underlying requirement set out at Condition D.4.6. Accordingly, Condition D.4.7 should be modified as follows:

D.4.7 Record Keeping Requirements

(a) To document compliance with Conditions D.4.2 and D.4.5, the Permittee shall maintain records in accordance with (1) through (6) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) To document compliance with Condition D.4.6, the Permittee shall maintain records of visible emission notations of the EU-97 stack exhaust once per shift when burning No. 2 fuel oil.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Response 30:

Condition D.4.7(b) has had the suggested wording added as follows:

D.4.7 Record Keeping Requirements

(b) To document compliance with Condition D.4.6, the Permittee shall maintain records of visible emission notations of the EU-97 stack exhaust once per shift **when burning No. 2 fuel oil**.

Comment 31:

Section D.5 – Insignificant Activities – All of this section should be deleted for the reasons set out

below.

Condition D.5.1 – Particulate Matter – This condition should be deleted because the emissions from the grinding and machining operations are not subject to 326 IAC 6-1 because they do not have the potential to emit of greater than 100 tons per year or actual emissions of greater than 10 tons per year. *See* 326 IAC 6-1-1(3). Accordingly, Condition D.5.1 should be deleted as follows:

~~D.5.1 Particulate Matter (PM)~~

~~Pursuant to 326 IAC 6-1 (Particulate emission limitations), the particulate matter emissions from the grinding and machining operations activities shall be limited to 0.03 grains per dry standard cubic foot, pursuant to 326 IAC 6-1-2(a).~~

Condition D.5.2 – Particulate Matter (PM) – This condition should be deleted because it is not necessary for determining compliance with Condition D.5.1 since that condition should be deleted, and this condition is redundant with Condition C.6 which references operation of control equipment.

~~D.5.2 Particulate Matter (PM)~~

~~In order to comply with Condition D.5.1, the PM controls shall be in operation at all times and control emissions from the grinding and machining operations, including the deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking, when these processes are in operation.~~

Response 31:

See Responses 2 and 9. All insignificant activities must comply with all State and Federal rules. In order to be classified as an insignificant activity, the grinding and machining operation must have the control device operating at all times. Therefore, no changes to either Condition D.5.1 or Condition D.5.2 are necessary.

Comment 32:

The Part 70 Permit Quarterly Reports – Pages 54 of 58 and 56 of 58 – These reports should be deleted because the underlying requirements are deleted.

Response 32:

Condition D.1.1(b) has been deleted in Response 8 as well as the quarterly report form for EU-12.Condition D.3.1 limits the amount of coal or equivalent fuel to 85,096 tons per twelve (12) consecutive month period. Since this condition has been retained, this quarterly report form has not been deleted.

Comment 33:

The changes referenced in these comments should also be reflected in the Technical Support Document.

Response 33:

The Technical Support Document (TSD) is not reissued. This Addendum to the TSD serves as the record for any changes that affect the TSD.

On December 13, 2001, Ann McIver of Citizens Thermal Energy, submitted comments on the proposed Part 70 Operating Permit. The comments are as follows: The permit language is changed to read as follows (deleted language appears as strikeouts, new language is bolded):

As owner/operator of coal fired boilers controlled by electrostatic precipitators, we have great concern with the compliance monitoring requirements imposed on the coal fired boiler at Seagrams, including those conditions which relate to:

Comment 1:

The imposition of a single operating range for ESP primary and secondary volts, and primary amps.

Response 1:

See Response 27 above.

Comment 2:

The use of opacity triggers that are below the allowable opacity limit.

Response 2:

This concern has been addressed and corrected in Response 25 above.

Comment 3:

Conflicting requirements on ESP inspections (the general condition requires inspections every two years, further in the condition the inspections are required if they haven't been done in the last six months).

Response 3:

As requested by Pernod Ricard USA, Seagram Lawrenceburg Distillery, the inspections have been changed to once every twelve (12) months.

Comment 4:

We support comments submitted by the IEUAWG on this permit as they relate to compliance monitoring, including opacity monitoring and parametric monitoring of control equipment operating conditions.

Response 4:

No response required.

On December 13, 2001, Mark G. Strimbu of IEUAWG (Indiana Electric Utility Air Work Group), submitted comments on the proposed Part 70 Operating Permit. The comments are as follows: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Comment 1:

Condition C.2 – Opacity – IEUAWG requests that a provision be added to the opacity limit to clarify that when opacity is monitored with a continuous opacity monitor, then ninety-eight percent compliance constitutes compliance with the requirement. IDEM has recognized that current control technologies cannot ensure one hundred percent compliance with the opacity standard. In addition, the regulation imposes a six minute opacity standard as a surrogate for particulate matter where the ambient particulate matter standard is based on a twenty-four hour period. Throughout the history of this rule, IDEM has recognized that three to five percent of exceedances of the six minute opacity standard is an acceptable range given the variability of boiler operations and the continuous monitoring

of data. IEUAWG requests that IDEM include a provision in the opacity limit that states that a source shall be considered in compliance with this limit if continuous opacity monitoring data reflects ninety-five to ninety-seven percent compliance.

Response 1:

The continuous opacity monitoring is governed by Conditions C.13 and D.3.7 to insure compliance with Condition C.2. The Part 70 Operating Permit's goal is to require continuous compliance with all rules. Therefore, no changes are required to Condition C.2.

Comment 2:

Condition C.13 – Maintenance of Opacity Monitoring Equipment – IEUAWG objects to any requirement that requires a source to read opacity for a minimum of one hour every four hours if the opacity monitor malfunctions. If a unit is operating at relatively steady state, one or two readings may be sufficient to determine that opacity is not in danger of being exceeded, without requiring one full hour of reading. In addition, this provision does not apply well to a unit with a wet scrubber because Method 9 observations will not provide reliable data in that instance. IEUAWG requests that this provision allow more flexibility based on actual real world situations rather than imposing an absolute mandate of one hour of continuous readings every four hours of downtime.

Response 2:

If desired, the source may request that a calibrated backup COM be incorporated into the permit and be brought online within four (4) hours of shutdown of the primary COM in place of the visible emission requirements. Therefore, since Seagrams has not requested this change, no change is required in the proposed permit.

Comment 3:

Condition C.21 – General Record Keeping Requirements – IEUAWG objects to any provision that requires records to be kept at a source location for a minimum of three years. Many sources are not currently staffed and most of the records would be available at different locations. There is no justification for requiring records to be on-site if they can be obtained within a reasonable amount of time upon request.

Response 3:

326 IAC 2-7-5(3) requires that records are to be kept at a source location for a minimum of three (3) years. Records of information older than three (3) years do not have to be kept onsite. Therefore, no change is required in the proposed permit.

Comment 4:

Conditions D.1.5 and D.3.6 – Particulate Matter – IEUAWG objects to any requirement that requires control devices to be operated at all times without providing for regulatory exclusions such as start-ups, shut-downs, emergencies, malfunctions, and compliance with the underlying regulations. Conditions D.1.5 and D.3.6 purport to require baghouses, scrubbers, cyclones, and electrostatic precipitators to be operated at all times when the controlled processes are in operation. These requirements conflict with the regulations that allow continued operation even when the control equipment is not operating. Such situations include start-ups, shut-downs, emergencies, malfunctions, and situations where a unit

can comply with the underlying regulations without operation of the control equipment. IEUAWG proposes that any such permit condition for these or other pollution control equipment should include the following language:

In order to comply with this limit, the control equipment shall be operating at all times the emitting equipment is in operation and shall control emissions from the emitting equipment at all times the emitting equipment is in operation, except for cases of start-up, shut-down, emergency, and/or malfunction, consistent with safe operating practices and protection of equipment, as allowed by applicable regulations, or in cases where the emitting unit can comply with the underlying limits without the operation of the emission control equipment.

Comment 5:

Conditions D.1.5 and D.3.6 – Particulate Matter – IEUAWG requests a provision that specifically states that control devices do not need to be operated during the start-up/shut-down exemption periods.

Responses 4 and 5:

Conditions D.1.5 and D.3.6 have had wording added to indicate that the control devices must be operated at all times except as otherwise provide by statute or rule or in this permit as follows:

D.1.5 Particulate Matter (PM)

(a) **In order to comply with Conditions D.1.1 and D.1.3, except as otherwise provided by statute or rule or in this permit, t**~~T~~he baghouses for PM control shall be in operation and control emissions from the EU-11 through, EU-14 and EU-34 through EU-36, at all times that the processes are in operation.

(b) **In order to comply with Condition D.1.3, except as otherwise provided by statute or rule or in this permit, t**~~T~~he scrubbers and cyclone for PM control shall be in operation and control emissions from the EU-32, at all times that the dryers, cooler and transport system are in operation.

D.3.6 Particulate Matter (PM)

In order to comply with Condition D.3.1, **except as otherwise provided by statute or rule or in this permit,** the electrostatic precipitator for PM control shall be in operation and control emissions from the steam boiler, known as EU-96, at all times that the steam boiler is in operation **and is firing coal, CBAF, or wood**.

Comment 6:

Condition D.1.7 – Baghouse Parametric Monitoring – IEUAWG objects to any requirement that requires instruments such as pressure gauges to be calibrated every six (6) months. Condition D.1.7 requires that a pressure gauge used to determine baghouse static pressure drop be calibrated once every six months. This requirement serves no useful purpose and is a substantial burden. Gauges such as pressure gauges or electronic gauges merely present an indicator that the control equipment is operating. A source may implement a variety of other actions, such as reviewing opacity data, to ensure proper operations of the control devices and the relevant gauges. Most such activities would be specified in a preventative maintenance plan. Neither IDEM nor the public would be harmed if this "calibration" requirement was not included, and its inclusion is inappropriate. If IDEM determined that noncompliance with an applicable emission limit existed, it could require submission of a preventative maintenance plan and identify any necessary changes.

Response 6:

Based on IDEM, OAQ experience, and to prevent possible deviations caused by instruments out of calibration, IDEM has changed its guidance from once per year and now requires calibration at least once every six (6) months. Therefore, no changes to the proposed permit are necessary.

Comment 7:

Condition D.1.9 – Broken or Failed Bag Detection, and Condition D.1.13 – Failure Detection – IEUAWG objects to any permit term such as these that require units to be shut down in the case that a piece of control equipment has "failed." A source may choose to implement other intermediate steps to achieve compliance, including such activities as changing the fuel type or temporarily derating the equipment. Requiring the shut-down of the equipment is not required by the regulations and is objectionable.

Response 7:

Condition D.1.9 provides an exclusion for multi-compartment units such that operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions).

Condition D.1.9 has been clarified to provide a better definition of baghouse failure for single compartment baghouses. See Response 14 to the source's comments. Therefore, no additional changes to Condition D.1.9 are necessary to accommodate other changes that may not assure compliance with the applicable PM rules, such as 326 IAC 6-1.

Condition D.1.13 has been clarified as shown in Response 18.

Comment 8:

Condition D.3.8 – Opacity Readings – IEUAWG objects to any provision that sets "trigger" below the applicable limit or that changes the time period for evaluating the limit. Condition D.3.8 sets a trigger below the thirty percent limit and to require activities to be conducted based on that trigger. This essentially changes the limit without any basis in law. It also conflicts with the regulatory provision for up to sixty percent opacity for a certain period. In addition, the provision could be construed to set the trigger at an opacity level measured instantaneously. Any opacity limit must be specified consistent with the regulatory provision six-minute opacity limit, not instantaneous.

Response 8:

The issue of triggering a response below an applicable limit has been corrected as addressed in Response 25 above.

Comment 9:

Condition D.3.9 – Preventative Inspections – IEUAWG objects to any provision that specifies the frequency of control equipment inspections and specifies the items within the control equipment to be inspected. These parameters vary widely and in any given second may temporarily fall outside of any given range. Permits are designed to establish regulatory requirements and to demand compliance with those requirements. The methods by which a source achieves compliance is within their sound

discretion. Prescribing inspection requirements are outside the jurisdiction of IDEM. Each source must determine what to inspect and the frequency based on the performance of the piece of equipment. Each source maintains preventative maintenance plans for these pieces of equipment, and if there are compliance problems, IDEM may seek to require the preventative maintenance plans to be improved.

Response 9:

See Response 26.

Comment 10:

Condition D.3.10 – Parametric Monitoring – IEUAWG objects to any provision that requires monitoring of primary voltage and primary current to an electrostatic precipitators as a surrogate parameter for determining performance of the control equipment. These parameters vary widely and in any given second may fall outside of any given range. Therefore, constantly reviewing this information serves absolutely no legitimate purpose. In addition, the voltages are frequently adjusted automatically based on the electrostatic precipitator operating system. Sources can determine the relevant efficiency of a electrostatic precipitator by viewing the opacity and other parameters, and reviewing voltage and current ranges is completely inappropriate.

IEUAWG would also object to any requirement that requires a certain number of ESP fields to be operating at all times. There are many methods for maintaining compliance other than maintaining a certain percentage of field availability, including temporary derating, changes in fuels, and other activities.

Response 10:

See Response 27.

Comment 11:

Condition D.3.11 – Record Keeping and Reporting Requirements – IEUAWG requests that any required reporting be no more extensive than that which is required by regulation. Specifically, IEUAWG requests that the permit terms only require submittal of quarterly excess emission reports pursuant to 326 IAC 3-5-7, SO_2 reports based on fuel sampling and analysis data required by 326 IAC 7-2-1 (or by use of a continuous emissions monitor if requested to follow those requirements), and an annual compliance certification. Any additional reporting is unnecessary and burdensome.

Response 11:

Quarterly reports are required to show continuous compliance for every twelve (12) consecutive month period with the State SIP and 326 IAC 6-1-8. Therefore, IDEM, OAQ has the authority to require reports more frequently than annually pursuant to 326 IAC 2-7-5(3)(C) to assure that the source is complying with all emission limitation specified in the proposed permit. Therefore, no additional changes are required to Condition D.3.11.

Comment 12:

General – Process Weight Rule – IEUAWG objects to the imposition of a process weight rule limit on non-manufacturing processes such as coal transfer stations and loading operations. These activities would be better regulated under a fugitive dust control plan or under existing fugitive dust regulations.

Response 12:

The process weight rule, 326 IAC 6-3-2, is not applicable to this proposed Pernod Ricard USA, Seagram Lawrenceburg Distillery permit which is subject to the requirements of both 326 IAC 6-1 and

326 IAC 6-1-8.

Responses 1 - 12:

IEUAWG does not have any standing with respect to the proposed Pernod Ricard USA, Seagram Lawrenceburg Distillery Part 70 Operating Permit. All comments related to the proposed Pernod Ricard USA, Seagram Lawrenceburg Distillery Part 70 Operating Permit have been addressed above.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

The following updates have been made to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and became effective on January 19, 2002. For more information about this rulemaking, refer to the October 2001 Air Pollution Control Board Packet which can be found on the Internet at http://www.state.in.us/idem/air/rules/apcb/packets/index.html. The rule revisions were published in the February 1, 2002 Indiana Register which can be found on the Internet at http://www.IN.gov/legislative/register/index-25.html.

Change 1:

Condition B.2 has had the rule cite 326 IAC 2-1.1-9.5 added to include the new promulgated rule which clarifies when permits expire and when conditions in previous issued permits are superseded as follows:

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

Change 2:

Condition B.12 Emergency Provisions (a), (b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology-based emission limitations only. The condition is changed as follows:

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation~~, except as provided in 326 IAC 2-7-16~~.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(g) ~~Operations may continue during an emergency only if the following conditions are met:~~

~~(1)~~ If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the

emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

Change 3:

Condition B.14 Multiple Exceedances has been deleted because 326 IAC 2-7-5(1)(E) has been repealed since it conflicted with 40 CFR 70.6(a)(6) as follows:

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

Change 4:

Condition B.14 Prior Permits Superseded was added to the proposed permit to implement the intent of the new rule 326 IAC 2-1.1-9.5 as follows:

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

Change 5:

Paragraph (b) of Condition B.13 Permit Shield has been deleted because this paragraph is no longer necessary due to the addition of the new Condition B.14 Prior Permits Superceded as follows:

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

Change 6:

U.S. EPA made it clear that there can not be a requirement to do something in a permit, then say that it's not a deviation when the source does not do it [see 40 CFR 70.6(a)(6)(i)]. IDEM may use enforcement discretion in these cases, but IDEM can not create an exemption through the TV permit. IDEM has revised Condition B.15 as well as Condition D.1.7, D.1.10 and D.1.11, Parametric Monitoring (and all other parametric monitoring conditions) to clarify the facility specific events that would not qualify as a deviation as follows:

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit,** shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

The ~~notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

~~(f)~~**(c)** Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

D.1.7 Baghouse Parametric Monitoring

The Permittee shall record the total static pressure drop across each baghouse used in conjunction with the EU-11, 12, 34, 35 and 36, at least once per shift when these processes are in operation when

venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise,~~ **When for any one reading, the** pressure drop across the baghouse~~ shall be maintained within~~ **is outside** the **normal** range of 0.5 and 5.5 inches of water or a range established during the latest stack test, ~~T~~**the Permittee shall take reasonable response steps in accordance with Section C-** Compliance Response Plan **- Preparation, Implementation, Records, and Reports**~~ for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **A pressure reading that is outside the above mentioned range is not a deviation from this permit.** Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.10 Scrubber Parametric Monitoring

The Permittee shall record the total static pressure drop across the scrubbers used in conjunction with EU-32 at least once per day when these processes are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise,~~ **When for any one reading, the** pressure drop across the scrubbers~~ shall be maintained within~~ **is outside** the **normal** range of 0.5 and 6.5 inches of water or a range established during the latest stack test, ~~T~~**the Permittee shall take reasonable response steps in accordance with Section C-** Compliance Response Plan **- Preparation, Implementation, Records, and Reports**~~ for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **A pressure reading that is outside the above mentioned range is not a deviation from this permit.** Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.11 Liquor Flow Rate

The Permittee shall record the flow rate **of the** scrubbing liquor used in conjunction with the dryers, EU-32, ~~and the fermenters, EU-22,~~ at least once per shift when **this**~~ these~~ emission unit~~s~~ **is** ~~are~~ in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise,~~ **When for any one reading, the** liquor flow rate ~~shall be maintained~~ **is below** ~~at~~ a minimum flow of 4.0 gallons per minute for the nozzles and 10.0 gallons per minute for the trays for scrubbers exhausted to stacks S-305 and S-306 as well as **below** ~~at~~ a minimum flow of 3.0 gallons per minute for the nozzles and 7.0 gallons per minute for the trays for scrubbers exhausted to stacks S-307 through S-309 or a **minimum** ~~range~~ established during the latest stack test, ~~T~~**the Permittee shall take reasonable response steps in accordance with Section C-** Compliance Response Plan **- Preparation, Implementation, Records, and Reports**~~ for this unit shall contain troubleshooting contingency and response steps for when the pressure readings are outside of the above mentioned range for any one reading.~~ **A flow rate reading that is less than the above mentioned minimum is not a deviation from this permit.** Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Change 7:

Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM has re-visited this issue with U.S. EPA. EPA asked that IDEM clarify Condition C.8 so that the Permittee understands that the asbestos notification should be certified by the owner or operator and not the responsible official. IDEM has also changed Condition C.19, so that it now requires a certification by the responsible official for the notification sent in response to non-compliance with a stack test. There are three (3) conditions that EPA and IDEM agreed that do not need a responsible official certification; Conditions B,11, B,12, and C.9. Conditions B.11 and C.9, PMPs and stack test protocol, do not qualify as an application, report, or compliance certification, and therefore are not required to be certified. The emergency report is excused from certification because the source only has two (2) days to submit it, and the same information will be certified when it is included in the Quarterly Deviation and Compliance Monitoring Report and the Annual Compliance Certification.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3). All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

June 28, 2002

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Joseph E. Seagram & Sons, Inc.**
Source Location:	**7 Ridge Avenue, Lawrenceburg, Indiana 47025**
County:	**Dearborn**
SIC Code:	**2085**
Operation Permit No.:	**T 029-6929-00005**
Permit Reviewer:	**Paula M. Cognitore**

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Joseph E. Seagram & Sons, Inc. relating to the operation of a distilled spirits production source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) pneumatic conveyor, known as EU-11, installed prior to 1950, equipped with a dust collector exhausted to S-103, capacity: 28.0 tons of corn, rye, barley and/or malt per hour.

(b) One (1) corn receiving and storage system, known as EU-12, installed in 1997, consisting of the following equipment:

(1) One (1) unloading hopper, exhausted to S-111, controlled by fabric filters for particulate matter control, capacity: 196 tons of corn per hour.

(2) One (1) conveyor and bucket elevator, exhausted to S-111, controlled by fabric filters for particulate matter control, capacity: 196 tons of corn per hour.

(3) One (1) storage silo, exhausted to S-111, controlled by fabric filters for particulate matter control, capacity: 75,000 bushels of corn.

(4) One (1) grain cleaner, exhausted to S-111, controlled by fabric filters for particulate matter control, capacity: 26.6 tons of corn per hour.

(5) One (1) grain transport system, exhausted to S-112, controlled by fabric filters for particulate matter control, capacity: 26.6 tons of corn per hour.

(c) Six (6) hammermills, collectively known as EU-14, exhausted to S-104, equipped with a baghouse for particulate matter control, installed prior to 1950, capacity: 109,760 pounds of grain per hour, total.

(d) Seven (7) storage bins, collectively known as EU-13, exhausted to S-103, installed prior to

1950, equipped with fabric filters for particulate matter control, five (5) with a capacity of 8,000 bushels, each and two (2) with a capacity of 4,000 bushels, each.

(e) Fourteen (14) open fermenters, collectively known as EU-21, exhausted to S-201, installed prior to 1950, capacity: 25,300 gallons, each.

(f) Twenty-four (24) closed fermenters, collectively known as EU-22, exhausted to S-202, collectively exhausted to one (1) ethanol scrubber, installed prior to 1950, capacity: 55,000 gallons, each.

(g) Two (2) beer wells #1 and #3, known as EU-23 and EU-24, respectively, exhausted to S-203 and S-204 respectively, installed prior to 1950, capacity: 38,886 and 102,098 gallons, respectively.

(h) Three (3) beer stills, collectively known as EU-25, exhausted to S-205, installed prior to 1950:

(1) Still #25, capacity: 4,600 gallons per hour,

(2) Still #26, capacity: 14,600 gallons per hour; and

(3) Still #31, capacity: 12,000 gallons per hour.

(i) Two (2) column & kettles, collectively known as EU-26, exhausted to S-206, installed prior to 1950, capacity: 727 proof gallons per hour, each.

(j) Three (3) gin stills #10, #22, and #23, collectively known as EU-27, exhausted to S-207, installed prior to 1950, capacity: 600 proof gallons per hour, each.

(k) One (1) doubler still, known as EU-29, exhausted to stack S-209, installed prior to 1950, capacity: 672 proof gallons per hour.

(l) Three (3) multi-column stills and five (5) distillation columns, known as EU-20 installed prior to 1950, consists of the following:

(1) spirits still V-2, exhausted to S-210, capacity: 583 proof gallons per hour,

(2) spirits still V-3, exhausted to S-210, capacity: 750 proof gallons per hour,

(3) spirits still V-15, exhausted to S-210, capacity: 3,750 proof gallons per hour;

(4) one (1) distillation column, exhausted to S-211, and

(5) four (4) unused distillation columns, exhausted to S-211.

(m) Four (4) paddle screens, collectively known as EU-31, installed prior to 1950, exhausted to S-301, capacity: 56,000 pounds per hour, each.

(n) Five (5) rotary dryers, one (1) cooler and one (1) transport system, known as EU-32 installed prior to 1950, consists of the following:

(1) Two (2) rotary dryers, exhausted to S-305 and S-306, each controlled by a wet

scrubber, capacity: 25,500 pound per hour, each,

(2) Three (3) rotary dryers, exhausted to S-307 through S-309, each controlled by a wet scrubber, capacity: 14,500 pounds per hour, each; and

(3) One (1) cooler and one (1) transport system, controlled by a cyclone, exhausted to S-310, capacity: 6.5 tons per hour.

(o) EU-33 installed prior to 1950, consists of the following:

(1) Three (3) conveyors, exhausted to S-302-S-304, capacity: 38,000 pounds per hour, each.

(p) One (1) DDG (Distillers Dried Grain) loadout system, installed in 1997 consists of the following:

(1) Two (2) storage silos, capacity: 13,100 cubic feet, each and two (2) surge hoppers, capacity: 7.0 tons per hour, each, known as, EU-34, equipped with two (2) dust collectors exhausted to S-341 - S-344.

(2) One (1) air transport system and scale to the rail car loading area, known as EU-35, controlled by a dust collector, exhausted to S-350, capacity: 7.0 tons per hour.

(3) One (1) air transport system and scale to the truck loading area, known as EU-36, controlled by a dust collector, exhausted to S-360, capacity: 7.0 tons per hour.

(4) One (1) rail car loader, known as EU-37, exhausted to S-370, capacity: 7.0 tons per hour.

(5) One (1) truck loader, known as EU-38, exhausted to S-380, capacity: 7.0 tons per hour.

(6) One (1) old DDG loader, known as EU-39, exhausted to S-111, capacity: 7.0 tons per hour.

(q) One (1) wine room, known as EU-41, consisting of thirty-five (35) tanks, installed prior to 1950, exhausted to S-410, capacity: 467,517 gallons of ethanol, total.

(r) One (1) tank farm, known as EU-42, consisting of nine (9) tanks, installed prior to 1950, exhausted to S-420, capacity: 750,000 gallons of ethanol, each.

(s) One (1) Bldg 88, known as EU-43, consisting of twenty-seven (27) tanks and, installed in 1989, exhausted to S-430, capacity: 489,250 gallons of ethanol, total and one (1) rum handling, installed in 1997, exhausted to the atmosphere, capacity: 3,501,429 gallons of rum.

(t) One (1) regauge tank area, known as EU-44, consisting of forty-seven (47) tanks, installed in 1960, exhausted to S-440, capacity: 445,858 gallons of ethanol, total.

(u) One (1) mini tank farm, known as EU-45, to consist of nine (9) tanks, seven tanks installed in 1989, exhausted to S-435, capacity: 779,800 gallons of ethanol, total, two (2) gin storage tanks, installed in 1997, capacity: 113,800 gallons of gin, each.

(v) One (1) bottling tank room, known as EU-51, consisting of forty-one (41) tanks, installed in 1969, exhausted to S-510, capacity: 412,000 gallons of ethanol, total.

(w) Seven (7) bottling lines, known as EU-52, installed prior to 1950, exhausted to S-520, capacity: 7,264 cases per hour.

(x) One (1) cooler operation, known as EU-53, installed prior to 1988, exhausted to S-530, capacity: 2,187 cases per hour.

(y) One (1) Warehouse C, known as EU-71, installed prior to 1950, exhausted to S-701, capacity: 69,306 barrels.

(z) One (1) Warehouse E, known as EU-72, installed prior to 1950, exhausted to S-702, capacity: 101,032 barrels.

(aa) One (1) Warehouse G, known as EU-73, installed prior to 1950, exhausted to S-703, capacity: 84,097 barrels.

(bb) One (1) Warehouse J & M, known as EU-74, installed prior to 1950, exhausted to S-704, capacity: 100,000 barrels.

(cc) One (1) Warehouse L, known as EU-75, installed prior to 1950, exhausted to S-705, capacity: 93,438 barrels.

(dd) One (1) Warehouse N, known as EU-76, installed prior to 1950, exhausted to S-706, capacity: 93,405 barrels.

(ee) One (1) coal fired steam boiler, known as EU-96, using coal-based alternative fuels (CBAF), natural gas, fuel oil #6, and wood, installed in 1977, exhausted to S-906, equipped with an electrostatic precipitator for particulate matter control, rated at 244 million British thermal units per hour.

(ff) One (1) natural gas fired steam boiler, known as EU-97 using fuel oil #2 as back-up, installed in 1992, exhausted to S- 907, rated at 47.6 million British thermal units per hour using natural gas and rated at 45.6 million British thermal units using fuel oil #2, equipped with a low NO_X burner.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than

or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(c) The following VOC and HAP storage containers: storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.(constructed prior to 1980)

(e) Cleaners and solvents characterized as follows: having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or; having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(f) Closed loop heating and cooling systems.

(g) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.

(h) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.

(i) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.

(j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(k) Paved and unpaved roads and parking lots with public access.

(l) Conveyors as follows: covered conveyors for coal or coke conveying of less than or equal to 360 tons per day.

(m) Coal bunker and coal scale exhausts and associated dust collector vents.

(n) Asbestos abatement projects regulated by 326 IAC 14-10.

(o) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(q) Emergency generators as follows: diesel generators not exceeding 1,600 horsepower.

(r) Other emergency equipment as follows: stationary fire pumps.

(s) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic

feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(t) Filter or coalescer media changeout.

(u) Vents from ash transport systems not operated at positive pressure.(not specifically regulated)

(v) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(w) Activities or categories of activities with individual HAP emissions: The Heads Still, a part of the distillation process, emits trace amounts of acetaldehyde, a listed HAP. Emissions occur inside the Still House.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

Permit Number	Issuance Date
OP 15-07-81-0054	December 9, 1977
OP 15-01-87-0087	January 11, 1984
OP 15-01-87-0088	January 11, 1984
OP 15-01-87-0085	January 11, 1984
OP 15-01-87-0086	January 11, 1984
AA to OP 15-01-87-0085 and OP 15-01-87-0086	March 25, 1986
OP 15-01-91-0123	June 5, 1987
OP 15-01-91-0124	June 5, 1987
OP 15-01-91-0125	June 5, 1987
OP 15-01-91-0126	June 5, 1987
OP 15-01-91-0127	June 5, 1987
OP 15-01-91-0128	June 5, 1987
OP 15-01-91-0129	June 5, 1987
OP 15-01-91-0130	June 5, 1987
OP 15-01-91-0131	June 5, 1987
OP 15-01-91-0121	June 16, 1987
OP 15-01-91-0122,	June 16, 1987

Permit Number	Issuance Date
AA to OP 15-01-91-0121 and OP 15-01-91-0122	April 25, 1989
CP 029-2159-00005	February 10, 1992
CP 029-6331-00005	March 14, 1997
CP 029-8389-00005	May 19, 1997
CP 029-8389-00005	May 19, 1997

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) OP 15-01-87-0085, issued on January 11, 1984

(1) Condition 5: That particulate emissions from Boiler #5 shall be limited to: 0.62 pounds per million British thermal units per hour and 209 tons per year.

(2) Condition 6: That the sulfur dioxide emissions from Boiler # 5 shall be limited to 1.92 pounds per million British thermal units per hour.

(3) Condition 7: That the annual usage of coal shall not exceed 30,000 tons per year.

Reason not incorporated: Boiler #5 has been removed.

(b) OP 15-01-87-0086, issued on January 11, 1984

Condition 5: That particulate emissions shall be limited to: 0.01 pounds per million British thermal units per hour and 5.2 tons per year.

Reason not incorporated: This Condition has been superceded by Condition 5 from the AA to OP 15-01-91-0122 issued April 25, 1989.

(c) OP 15-01-87-0087 and OP 15-01-87-0088, both issued January 11, 1984

Condition 5: That the particulate emissions shall be limited to 3.0 tons per year.

Reason not incorporated: This emission unit was constructed prior to the applicability to 326 IAC 2-2.

(d) OP 15-01-87-0088, both issued January 11, 1984

Condition 5: That the particulate emissions shall be limited to 60.0 tons per year.

Reason not incorporated: This emission unit was constructed prior to the applicability to 326 IAC 2-2.

(e) OP 15-01-91-0121, issued on June 16, 1987

(1) Condition 4: That the sulfur dioxide emissions from Boiler #5 shall be limited to 1.92

pounds per million British thermal units per hour pursuant to the 1983 SO_2 SIP Revision.

(2) Condition 6: That in order to protect the NAAQS the annual usage of coal shall be limited to 30,000 tons per year pursuant to the 1983 SO_2 SIP Revision.

(3) Condition 8: That in order to minimize particulate matter emissions priority shall be given towards operating Boiler #6 (EU-96) over Boiler #5.

Reason not incorporated: Boiler #5 has been removed.

(f) OP 15-01-91-0122 issued June 16, 1987

Condition 7: That in order to minimize particulate matter emissions priority shall be given towards operating Boiler #6 (EU-96) over Boiler #5.

Reason for change: Boiler #5 has been removed.

(g) AA to OP 15-01-91-0121 and OP 15-01-91-0122, issued April 25, 1989

(1) Condition 5 on Permit 15-01-91-0122: That the particulate matter emissions shall be limited to 0.180 pounds per million British thermal units per hour and combined particulate matter emissions from Boilers #5 and #6 (now EU-96) shall be limited to 214.2 tons per twelve (12) consecutive month period pursuant to 326 IAC 6-1-8.1.

This condition will now read:

Pursuant to 326 IAC 6-1-8.1, the particulate matter emissions from steam boiler, known as EU-96, shall be limited to:

(a) 0.180 pounds per million British thermal units, and

(b) 85,096 tons of coal per twelve (12) consecutive month period, equivalent to 214.2 tons of PM per year. The minimum overall PM control efficiency for the electrostatic precipitator on this boiler shall not be less than 94.4% to comply with these limit. For purposes of showing compliance with this fuel limit, the following equivalencies shall be used:

(1) One (1) million cubic feet of natural gas is equivalent to 0.021 tons of coal,

(2) One kilogallon of No. 6 fuel oil is equivalent to 0.138 tons of coal, and

(3) One (1) ton of wood is equivalent to 0.056 tons of coal.

(2) Condition 5 from Permit 15-01-91-0121: That the particulate matter emissions shall be limited to 0.620 pounds per million British thermal units per hour when Boiler #6 (EU-96) is using natural gas or is not in operation. Particulate matter emissions shall be limited to 0.180 pounds per million British thermal units at any time during which Boiler 6 is using fuel other than natural gas. Combined particulate matter emissions from Boilers #5 and #6 shall be limited to 214.2 tons per twelve (12) consecutive month

period. Particulate matter emissions from Boiler #5 shall be limited to 209 tons er twelve (12) consecutive month period. These limits are pursuant to 326 IAC 6-1-8.1.

Reason for change: Boiler #5 has been removed from the source; therefore, the above condition was revised to include only EU-96 on coal, natural gas, No. 6 fuel oil and wood.

(h) CP 029-2159-00005, issued February 10, 1992

(1) Condition 4: That particulate matter emissions from boiler 7 (now EU-97) shall comply with 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating). The source shall be limited to actual Emissions of 0.014 pounds per million British thermal units, which shall satisfy this rule.

Reason for change: This Condition has been superceded by 326 IAC 6-1. Particulate matter emissions from EU-97 shall be limited to 0.01 grains per dry standard cubic foot, pursuant to 326 IAC 6-1-2(b)(5).

(2) Condition 8: Boiler 7 (EU-97) shall be limited to 154 thousand gallons of grade 2 fuel oil per month. This condition, and operation condition 7 limit the source to 39.9 tons sulfur dioxide per year, therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-23 and 40 CFR 52.21, will not apply.

Reason for change: The monthly limit has been revised to 1,848,000 gallons per twelve (12) consecutive month period. This revised limit is equivalent to 39.9 tons per year based on new emission factors; therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-23 and 40 CFR 52.21, will not apply.

(7) The record keeping required by 326 IAC 7-4-13(3)(B) are no longer applicable since only Boiler No. 6, now known as EU-96, remains in service and Boiler 5 has been removed from the source.

326 IAC 7-4-13(3)(B) stated that if Boilers 5 and 6 are being operated at the same time, only one (1) of the boilers may use coal or fuel oil. Seagram shall maintain a record of the fuel type used at Boilers 5 and 6 in order to demonstrate compliance with the requirements of this rule. When both boilers are operating simultaneously, daily logs shall be kept. Such records shall be made available to the department upon request. Within thirty (30) days following the end of the calendar quarter in which both Boilers 5 and 6 operated simultaneously, Seagram shall report to the department the fuels used, including daily information for each day during which both boilers operated simultaneously.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional

information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on October 15, 1996: Additional information was received on February 22, August 21, and September 7, 2000.

A notice of completeness letter was mailed to the source on May 19, 1997.

Emission Calculations

See pages 1 through 16 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

This table also reflect emissions from the warehouses. Even without such emissions, the source would still be subject to the Part 70 Operating Permit Program. IDEM, OAQ recognizes the inconsistencies between EPA Regions in regards to warehouse emissions being considered fugitive. Currently, OAQ is working with EPA to resolve such inconsistences.

Pollutant	**Potential To Emit** (tons/year)
PM	5,718
PM_{10}	1,377
SO_2	1,679
VOC	2,533
CO	552
NO_X	966

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Potential To Emit** (tons/year)
Acetaldehyde	0.486
Isophorone	0.025

HAPs	**Potential To Emit** (tons/year)
Lead	0.020
Manganese	0.468
Benzene	0.055
Benzyl chloride	0.030
Methyl chloride	0.023
Selenium	0.058
Cyanide	0.106
Naphthalene	0.010
Toluene	0.054
Xylene	0.001
Antimony	0.045
Cobalt	0.052
Manganese	0.027
Nickel	0.723
Formaldehyde	0.657
Dichlorobenzene	0.010
Hexane	15.8
Cadmium	0.010
Chromium	0.013
Acrolein	0.0004
Styrene	0.0002
Hydrogen Chloride	0.002
Arsenic	0.001
Beryllium	0.001
Mercury	0.001
TOTAL	18.7

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a

combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAQ emission data.

Pollutant	**Actual Emissions** (tons/year)
PM	46.5
PM_{10}	26.3
SO_2	629
VOC	467
CO	15.2
NO_X	471
Acetaldehyde (1994)	1.40

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
EU-11	0.598	0.144	0.00	0.00	0.00	0.00	0.00
EU-12	6.20	6.20	0.00	0.00	0.00	0.00	0.00
EU-13	0.245	0.061	0.00	0.00	0.00	0.00	0.00
EU-14	0.608	0.167	0.00	0.00	0.00	0.00	0.00
EU-20-EU-29	0.00	0.00	0.00	26.2	0.00	0.00	0.462
EU-31, EU-33	0.00	0.00	0.00	440	0.00	0.00	0.00
EU-32	15.0	8.28	0.00	0.00	0.00	0.00	0.00
EU-34 - EU-36	1.862	1.862	0.00	0.00	0.00	0.00	0.00
EU-37 & EU-38	5.48	5.48	0.00	0.00	0.00	0.00	0.00
EU-39	0.843	0.230	0.00	0.00	0.00	0.00	0.00

EU-41-EU-45, EU-51-EU-53 and EU-71-EU-76	0.00	0.00	0.00	1962	0.00	0.00	0.00
EU-96	214.2	20.7	1617	99.4	534	936	17.8
EU-97	1.87	1.87	39.9	0.713	10.8	18.7	0.248
Insignificant Activities	11.0	11.0	10.5	4.0	6.0	16.0	5.0
Total Emissions	258	56	1669	2533	551	971	23.5

Note: (1) The minimum overall PM control efficiency for the ESP on boiler, EU-96 is 94.4%, equivalent to 214.2 tons of PM per year pursuant to 326 IAC 6-1-8. Pursuant to 326 IAC 7-4-13, the boiler, EU-96, is limited to 1.92 pounds of SO_2 per million British thermal units per hour. The emissions after control from EU-96 is less than one-hundred (100) tons per year.

(2) Pursuant to CP 029-2159-00005 issued February 10, 1992, steam boiler, known as EU-97, shall be limited to 1,848,000 gallons of No. 2 fuel oil per twelve (12) consecutive month period and no fuel shall be combusted that contains greater than 0.3% sulfur. These limits limit the source to 39.9 tons sulfur dioxide per year.

(3) The amount of raw material throughput to EU-12 is limited to 1,492,487 tons of raw materials per twelve (12) consecutive month period, equivalent to 6.22 tons of PM/PM_{10} per year to avoid the applicability of 326 IAC 2-2 pursuant to CP 029-6331-00005, issued March 14, 1997.

(4) Pursuant to CP 029-6331-00005, issued March 14, 1997, the PM/PM_{10} from EU-34, EU-35 and EU-36 are limited to 0.596 tons per year for EU-34 and 1.266 tons per year for EU-35 plus EU-36.

(5) Pursuant to CP 029-6331-00005, issued March 14, 1997, the PM/PM_{10} from EU-37 and EU-38 are limited to 5.48 tons per year.

County Attainment Status

The source is located in Dearborn County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation

of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Dearborn County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Dearborn County has been classified as attainment or unclassifiable for pollutant(s). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) This Part 70 does not involve a pollutant-specific emissions unit with the potential to emit after control in an amount equal to or greater than one hundred (100) tons per year. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

(b) All the tanks located at this source are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b), Subpart Kb, because the vessels are used to store beverage alcohol.

(c) The grain terminal elevators at this source are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.300), Subpart DD, because the grain terminal elevators at the source have a permanent storage capacity (grain storage capacity inside a building, bin or silo) have less than 2.5 million bushels.

(d) The one (1) coal fired steam boiler, known as EU-96, using CBAF, natural gas, fuel oil #6, and wood as back-up is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.60.40c, Subpart Db. because it was installed before the June 19, 1984 applicability date.

(e) The natural gas-fired steam boiler with No.2 fuel oil back-up, known as EU-97 is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.60.40c, Subpart Dc. because it was installed after the June 9, 1989 applicability date and are rated between 10 and 100 million British thermal units per hour. The amount and type of fuel combusted each day must be recorded. When boiler EU-97 is fired by No. 2 fuel oil, no fuel oil shall be combusted that contains greater than 0.5 weight percent sulfur based on a higher heating value of 140 million Btu's per thousand gallons of fuel oil.

(f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source. The degreasing operation is not subject to 40 CFR 63, Subpart T since it does not use any halogenated solvents.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on October 15, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration)

(a) Pursuant to CP 029-2159-00005 issued February 10, 1992, steam boiler, known as EU-97, shall be limited to 1,848,000 gallons of No. 2 fuel oil per twelve (12) consecutive month period and no fuel shall be combusted that contains greater than 0.3% sulfur. These limits limit the source to 39.9 tons sulfur dioxide per year; therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply. These limits will also satisfy the requirements of 326 IAC 7-1 and 326 IAC 12-1.

(b) Pursuant to CP 029-6331-00005 issued March 14, 1997:

(1) the particulate matter (PM) and PM_{10} emissions from the corn truck unloading hopper, grain receiving elevator and conveyor, corn storage silo, and grain cleaner (part of EU-12) shall not exceed 1.20 pounds per hour, equivalent to 5.26 tons per twelve (12) consecutive month period,

(2) the PM and PM_{10} emissions from the grain air transport system in EU-12 shall not exceed 0.219 pounds per hour, equivalent to 0.959 tons per twelve (12) consecutive month period,

(3) the PM and PM_{10} emissions from EU-34 shall not exceed 0.136 pounds per hour, equivalent to 0.596 tons per twelve (12) consecutive month period,

(4) the PM and PM_{10} emissions from EU-35 and EU-36 shall not exceed 0.289 tons pounds per hour, equivalent to 1.27 per twelve (12) consecutive month period,

(5) the PM and PM_{10} emissions from EU-37 and EU-38 shall not exceed 1.25 tons pounds per hour, equivalent to 5.48 per twelve (12) consecutive month period.

These conditions will also make the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21; and the Emission Offset rule, 326 IAC 2-3 inapplicable to this source,

because although the uncontrolled particulate matter (PM); and particulate matter 10 microns (PM10) emissions from this modification are more than twenty-five (25) tons, and fifteen (15) tons per year, respectively, these conditions will control the emissions to be less than those amounts. In addition, compliance with these conditions will demonstrate compliance with 326 IAC 6-3-2.

(c) (1) Pursuant to 326 IAC 2-3, the total particulate matter emissions from EU-11 and EU-14 shall be limited by the following equation:

Throughput to EU-11 (tons/month) * 0.975 lbs/ton *1 ton/2,000 lbs + Throughput to EU-14 (tons/month * 0.945 lbs/ton

and shall not exceed 3.0 tons of PM per twelve (12) consecutive month period. Compliance with this limit makes the provisions of 326 IAC 2-3 not applicable.

(2) Pursuant to 326 IAC 2-3, the total PM_{10} emissions from EU-11 and EU-14 shall be limited by the following equation:

Throughput to EU-11 (tons/month) * 0.235 lbs/ton+ Throughput to EU-14 (tons/month) * 0.260 lbs/ton *1 ton/2,000 lbs

and shall not exceed 3.0 tons of PM_{10} per twelve (12) consecutive month period. Compliance with this limit makes the provisions of 326 IAC 2-3 not applicable.

(d) Pursuant to 326 IAC 2-3, the particulate matter (PM) and PM_{10} emissions from EU-32 shall be limited to 13.7 pounds per hour, equivalent to 60.0 tons per twelve (12) consecutive month period.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than (100) tons per year) of all criteria pollutants. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 2-7-5(13) (Preventive Maintenance Plan)

(a) A Preventive Maintenance Plan is required for emission units EU-11, 12, 32, 34 - 38 and EU-96 and 97 because these emission units would have been subject to an applicable requirement if there was not a condition limiting their potential to emit.

(b) A Preventive Maintenance Plan is required for emission units EU-31 and 33 because these uncontrolled emission units have actual emissions greater than twenty five (25) tons per year.

(c) A Preventive Maintenance Plan is required for emission unit EU-22 because this emission unit is controlled and while there are no “allowable emission limits” actual emissions exceed twenty five (25) tons per year.

(d) A Preventive Maintenance Plan is not required for emission units EU-13 and 14, even though they have control devices because:

(1) The allowable PM, SO_2 or VOC emissions do not exceed ten (10) pounds per hour, and

(2) There is no NSPS or NESHAP that applies.

(e) A Preventive Maintenance Plan is not required for emission units EU-20, 21, 23 - 29, 30, 39, 41 - 45 and 51 -53 because these emission units do not have controls and actual emissions do not exceed twenty-five (25) tons per year.

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-1-2 (Particulate emission limitations)

(a) Particulate matter emissions from all facilities except EU-96 and EU-97 shall be limited to 0.03 grains per dry standard cubic foot, pursuant to 326 IAC 6-1-2(a). (See page 16 of Appendix A for compliance)

(b) Particulate matter emissions from EU-97 shall be limited to 0.01 grains per dry standard cubic foot, pursuant to 326 IAC 6-1-2(b)(5).

326 IAC 6-1-8.1 (Dearborn County particulate matter emission limitations)

Pursuant to 326 IAC 6-1-8.1, the particulate matter emissions shall be limited to 0.180 pounds per million British thermal units and particulate matter emissions from EU-96 shall be limited to 214.2 tons per twelve (12) consecutive month period.

326 IAC 7 (Sulfur Dioxide Emission Limitations)

The potential to emit SO_2 from boiler EU-96, which can operate on coal, CBAF, natural gas, No. 6 fuel oil and wood and EU-97 which can operate on natural gas and No. 2 fuel oil are both greater than 25 tons per year; therefore, the requirements of 326 IAC 7 are applicable. The sulfur dioxide emissions from EU-96 shall be limited to six (6.0) pounds per million British thermal units per hour when firing on coal. The sulfur dioxide emissions from EU-97 shall be limited to and five-tenths (0.5) pounds per million British thermal units when operating on No. 2 fuel oil.

326 IAC 7-4-13 (Dearborn County sulfur dioxide emission limitations)

Pursuant to 326 IAC 7-4-13(3)(A) EU-96 is limited to 1.92 pounds of SO_2 per million British thermal units

heat input.

326 IAC 8-1-6 (New facilities; general reduction requirements)

(a) Since EU-20 - EU-29, EU-31, EU-33, EU-41, EU-42, EU-44, EU-51, EU-52, and EU 71 - EU-76 were built prior to January 1, 1980, the requirements of 326 IAC 8-1-6 are not applicable.

(b) Since EU-43, EU-45 and EU-53 each have emissions less than twenty-five (25) tons per year, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

(a) Since EU-20 - EU-29, EU-31, EU-33, EU-41, EU-42, EU-44, EU-51, EU-52, and EU 71 - EU-76 were built prior to October 7, 1974, the requirements of 326 IAC 8-6 are not applicable.

(b) Since EU-43, EU-45 and EU-53 each have emissions less than one hundred (100) tons per year, the requirements of 326 IAC 8-6 are not applicable.

State Rule Applicability - Insignificant Activities

326 IAC 6-1 (Particulate emission limitations)

Particulate matter emissions from all grinding and machining operations activities shall be limited to 0.03 grains per dry standard cubic foot, pursuant to 326 IAC 6-1-2(a).

326 IAC 20-6 (Halogenated Solvent Cleaning)

The degreasing operations are not subject to this rule and 40 CFR 63 Subpart T since it does not use any halogenated solvents.

Testing Requirements

EU-96 shall be tested for PM because more than 40 (%) percent of the PM emissions at the source are from boiler EU-96 and this will assure that the introduction of CBAF as a fuel will not adversely affect compliance with the allowable PM emission rate pursuant to 326 IAC 6-1.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in

relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) EU-11, EU-12, EU-34, EU-35 and EU-36 have applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the exhaust from EU-11, EU-12, EU-34, EU-35 and EU-36 shall be performed once per day during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(2) The Permittee shall record the total static pressure drop across the baghouses controlling the above referenced equipment, at least once daily when the above equipment is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 to 5.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

(3) An inspection shall be performed each calender quarter of all bags controlling the operations at this source when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(4) In the event that bag failure has been observed:

(A) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(B) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or

replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses for the above processes must operate properly to ensure compliance with 326 IAC 6-1, 326 IAC 2-2 and 326 IAC 2-7 (Part 70).

(b) EU-22 and EU-32 (dryers) have applicable compliance monitoring conditions as specified below:

(1) The Permittee shall record the total static pressure drop across the scrubbers controlling EU-22 and EU-32, at least once per day when EU-22 and EU-32 are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the scrubber shall be maintained within the range of 0.5 to 6.5 inches of water or within the range of inches of water as specified by the manufacturer selected indicative of normal operations or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

(2) The Permittee shall record the flow rate scrubbing liquor used in conjunction with the dryers, EU-32 and the fermenters EU-22, at least once per shift when these emission units are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the liquor flow rate shall be maintained at a minimum flow specified by the manufacturer for normal operations or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the flow rate reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the scrubbers for EU-32 and EU-22 must operate properly to ensure compliance with 326 IAC 6-1 and 326 IAC 2-7 (Part 70).

(c) EU-32 (cooler and transport) has applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of EU-32 (cooler and transport) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(2) An inspection shall be performed each calender quarter of the cyclone controlling the

cooler and transport operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

(3) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the cyclone must operate properly to ensure compliance with 326 IAC 5-1, 326 IAC 6-1 and 326 IAC 2-7 (Part 70).

(d) EU-37and EU-38 have applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the exhaust from EU-37 and EU-38 shall be performed once per day during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the cyclone must operate properly to ensure compliance with 326 IAC 5-1, 326 IAC 6-1 and 326 IAC 2-7 (Part 70).

(e) EU-96 has applicable compliance monitoring conditions as specified below:

(1) The ability of the ESP to control particulate emissions shall be monitored once per shift, when the unit is in operation, by measuring and recording the opacity of emissions.

(2) Appropriate response steps shall be taken in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps whenever the opacity exceeds 20 percent*. In the event of opacity exceeding 35 percent*, the boiler will be shut down, if necessary, so that T-R sets or the ESP can be repaired or the cause(s) leading to T-R set outages or ESP malfunction can be corrected.

*(Other values may be used if it can be demonstrated that a higher opacity can be reached without demonstrating noncompliance with the PM limitation, but in no case rise above 35 percent. Response steps planned to restore T-R sets or repair the ESP are to be included in the Preventive Maintenance Plan.)

(3) The following inspections shall be performed at least once every two years in accordance with the Preventive Maintenance Plan prepared in accordance with Section

B - Preventive Maintenance Plan:

(A) Plate and electrode alignment;

(B) ESP component/controller failure;

(C) Air and water infiltration;

(D) Start-up and shutdown practices;

(E) Flue gas conditioning;

(F) Spare parts availability; and

(G) Flyash conveyance.

(f) Plate and electrode alignment measurements shall be taken whenever there is an outage of any nature lasting more than three days unless such measurements have been taken within the past six months.

(g) All other inspections shall be made whenever there is an outage of any nature lasting more than three days unless such measurements have been taken within the past twelve months.

(h) The ability of the ESP to control particulate emissions shall be monitored once per shift, when the unit is in operation, by measuring and recording the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.

(i) Appropriate response steps shall be taken in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps whenever operation is outside any of the following ranges:

(1)	Primary voltage:	260 - 300 V
(2)	Secondary voltage:	35 - 55 kV
(3)	T-R set primary current:	50 -75 A

(j) Daily visible emissions notations of the exhaust from EU-96 shall be performed once per shift during normal daylight operations when burning coal, oil or wood. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the ESP for EU-96 must operate properly to ensure compliance with 326 IAC 5-1, 326 IAC 6-1 and 326 IAC 2-7 (Part 70).

The compliance monitoring requirements applicable to this source are as follows:

(e) EU-97 has applicable compliance monitoring conditions as specified below:

Daily visible emissions notations of the exhaust from EU-97 shall be performed once per shift during normal daylight operations when burning No. 2 fuel oil. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Conclusion

The operation of this distilled spirits production source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 029-6929-00005.**

Appendix A: Emissions Calculations
Grain Receiving and Handling

Company Name: Joseph E. Seagram & Sons, Inc.
Address City IN Zip: 7 Ridge Avenue, Lawrenceburg, Indiana
Part 70: T 029-6929
Plt ID: 029-00005
Reviewer: Paula M. Cognitore
Date: October 15, 1996

EU-11

Throughput	EU-11
bushels/yr	8,760,000
pounds/hr	56000
tons/hr	28.0

	Grain Receiving & Internal Operation Emisson Factors	Potential PM Emissions (lb/hr)	Potential PM Emissions (tons/yr)	Potential PM10 Emissions (lb/hr)	Potential PM10 Emissions (tons/yr)
EU-11					
PM Emission Factor (Grain Receiving) lb/ton	0.15	**27.3**	**120**	**6.58**	**28.8**
PM Emission Factor (Internal Operation) lb/ton	0.825	Controlled PM	Controlled PM	Controlled PM10	Controlled PM10
PM 10 Emission Factor (Grain Receiving) lb/ton	0.035	Emissions	Emissions	Emissions	Emissions
PM10 Emission Factor (Internal Operation) lb/ton	0.2	(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)
Control Efficiency	99.5%	**0.136**	**0.598**	**0.033**	**0.144**

EU-12

Throughput	EU-12
bushels/yr	61,320,000
pounds/hr	392000
tons/hr	196

	Emisson Factors	Potential PM Emissions (lb/hr)	Potential PM Emissions (tons/yr)	Potential PM10 Emissions (lb/hr)	Potential PM10 Emissions (tons/yr)
EU-12					
PM Emission Factor (Unloading Hopper) lb/ton	0.15	**326**	**1429**	**79.3**	**347**
PM Emission (Factor Elevator) lb/ton	0.435				
PM Emission Factor (Corn Silo) lb/ton	0.05				
PM Emission Factor (Grain Cleaner) lb/ton	0.205				
PM Emission Factor (Transfer to Bins) lb/ton	0.825				
PM10 Emission Factor (Unloading Hopper) lb/ton	0.0375				
PM10 Emission (Factor Elevator) lb/ton	0.105				
PM10 Emission Factor (Corn Silo) lb/ton	0.0125	Controlled PM	Controlled PM	Controlled PM10	Controlled PM10
PM10 Emission Factor (Grain Cleaner) lb/ton	0.0496	Emissions	Emissions	Emissions	Emissions
PM10 Emission Factor (Transfer to Bins) lb/ton	0.2	(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)
Control Efficiency	99.5%	**1.63**	**7.15**	**0.397**	**1.74**

EU-13 (Grain Bins)

Throughput	EU-13
bushels/yr	70,080,000
pounds/hr	448000
tons/hr	224.0

	Grain Receiving & Internal Operation Emisson Factors	Potential PM Emissions (lb/hr)	Potential PM Emissions (tons/yr)	Potential PM10 Emissions (lb/hr)	Potential PM10 Emissions (tons/yr)
EU-13					
PM Emission Factor (Bin Loading) lb/ton	0.05	**11.2**	**49.1**	**2.80**	**12.3**
PM 10 Emission Factor (Grain Receiving) lb/ton	0.0125	Controlled PM Emissions (lb/hr)	Controlled PM Emissions (tons/yr)	Controlled PM10 Emissions (lb/hr)	Controlled PM10 Emissions (tons/yr)
Control Efficiency	99.5%	**0.056**	**0.245**	**0.014**	**0.061**

EU-14 (GRAIN MILLLING)

Throughput	EU-14
bushels/yr	9,198,000
pounds/hr	58800
tons/hr	29.4

	Grain Receiving & Internal Operation Emisson Factors	Potential PM Emissions (lb/hr)	Potential PM Emissions (tons/yr)	Potential PM10 Emissions (lb/hr)	Potential PM10 Emissions (tons/yr)
EU-14					
PM Emission Factor (Hammermills) lb/ton	0.12	**27.8**	**122**	**7.64**	**33.5**
PM Emission Factor (Meal Hoppers) lb/ton	0.825	Controlled PM	Controlled PM	Controlled PM10	Controlled PM10
PM 10 Emission Factor (Grain Receiving) lb/ton	0.06	Emissions	Emissions	Emissions	Emissions
PM10 Emission Factor (Internal Operation) lb/ton	0.2	(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)
Control Efficiency	99.5%	**0.139**	**0.608**	**0.038**	**0.167**

Methodology

Emission factors are from AP 42 Table 9.9.1-1 l Particulate Emission Factors for Grain Elevators, AP42Interim Section 9.9.1-45
Potential Emissions in lb/hr = Throughput (ton/hr)*EF (lb/ton)
Potential Emissions in lb/day = PE (lb/hr) * 24 hours/day
Potential Emissions in ton/yr = PE (lb/hr) * 8760 (hours/yr) / 2000 (lbs/ton)
Controlled Emissions in tons/yr =(1-CE) * PE tons/yr

Appendix A: Emissions Calculations
Mashing, Fermenting and Distiling

Company Name: Joseph E. Seagram & Sons, Inc.
Address City IN Zip: 7 Ridge Avenue, Lawrenceburg, Indiana
Part 70: T 029-6929
Plt ID: 029-00005
Reviewer: Paula M. Cognitore
Date: October 15, 1996

EU-21 (Open Fermenters)

Maximum Usage (bu/yr)	Ethanol Emission Factor (lb/1000bu)	Ethyl Acetate Emission Factor (lb/1000bu)	Isoamyl Alcohol Emission Factor (lb/1000bu)	Isobutyl Emission Factor (lb/1000bu)
1,095,000	14.2	0.046	0.013	0.004

Ethanol Potential Emissions (tons/yr)	Ethyl Acetate Potential Emissions (tons/yr)	Isoamyl Alcohol Potential Emissions (tons/yr)	Isobutyl Potential Emissions (tons/yr)	Total Uncontrolled VOC Emissions (tons/yr)
7.77	0.025	0.007	0.002	7.81

EU-22 (Closed Fermenters)

Maximum Usage (bu/yr)	Ethanol Emission Factor (lb/1000bu)	Ethyl Acetate Emission Factor (lb/1000bu)	Isoamyl Alcohol Emission Factor (lb/1000bu)	Isobutyl Emission Factor (lb/1000bu)	Control Efficiency 90.0%
8,103,000	14.2	0.046	0.013	0.004	

Ethanol Potential Emissions (tons/yr)	Ethyl Acetate Potential Emissions (tons/yr)	Isoamyl Alcohol Potential Emissions (tons/yr)	Isobutyl Potential Emissions (tons/yr)	Total Uncontrolled VOC Emissions (tons/yr)	Total Controlled VOC Emissions (tons/yr)
57.53	0.186	0.053	0.016	57.8	5.78

Methodology
Emission Factors are from AP-42 Table 9.12.3-1 (3/97)
Uncontrolled Potential Emissions = Maximum Usage Rate (bu/yr) * Emission Factor/1000(bu)/ 2000 (lb/ton)
Controlled Emission Factor = Uncontrolled Emission Factor * (1-Control Efficiency), control is from removal

EU-23 and EU-24, (Beer Wells #3 and #1)

Maximum Usage (1000 bu/hr)	VOC Emission Factor (lb/1000bu)	Emission Rate (lb/hr)	Maximum Uncontrolled Emissions (tons/yr)
1050	2.7	2.86	12.5

Methodology
Emission Factor is based on information provided by source
Emission Rate (lb/hr) = Maximum Usage Rate (1,000 gal/hr) * Emission Factor (lb/1000gal)

EU-20, EU25-29 (Distillation)

Maximum Usage (gal/hr)	VOC Emission Factor (lb/1000gal)	VOC Emission Rate (lb/hr)	VOC Emission Rate (tons/yr)
31221	0.000679	0.021	0.093

HAPS for Fermentaion/Distillation

Acetaldehyde (HAP) Emission Rate* (tons/yr)
0.462

Methodology
Emission Factor is based on information provided by the source
Emission Rate (lb/hr) = Maximum Usage Rate (1,000 gal/hr) * Emission Factor (lb/1,000gal)
* The HAP emission rate is based on calculations provided by the source.

Appendix A: Emission Calculations
Dryer House

Company Name: Joseph E. Seagram & Sons, Inc.
Address City IN Zip: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Part 70: T 029-6929
Plt ID: 029-00005
Reviewer: Paula M. Cognitore
Date: October 15, 1996

EU-31,EU-33

	Maximum Usage	*VOC Emission Factor	VOC Emission Rate	VOC Emission Rate
	(gal/hr)	(lb/1000gal)	(lb/hr)	(tons/yr)
Spirits System	20,859	3.4	70.9	**311**
Whisky System	4319	6.8	29.4	**129**

Methedology

VOC Emission Rate = Maximum Usage * VOC Emission Factor
* Spirits System analysis of stilage based on 0.05% alcohol concentration.
Whisky System analysis of stilage based on 0.1% alcohol concentraion.

PM and PM10
EU-31 & EU-33 (Paddle Screens & Cake Conveyors) have a 73% and 66% moisture content, respectively; therefore, 'PM and PM10 emissions are negligible.

PM/PM10
EU-32

	Maximum Usage	Controlled PM Emission Factor	Controlled PM10 Emission Rate	Controlled PM Emissions	Controlled PM10 Emissions	Uncontrolled PM Emissions	Uncontrolled PM10 Emissions
	(tons/hr)	(lb/ton)	(lb/ton)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
EU-32	7.00	0.490	0.270	**15.0**	**8.28**	**100**	**55.2**

Methedology

Controlled Emission FActor from AP-42 9.9-7.1, Uncontrolled calculated assuming 85% Control Efficiency
Controlled Emission Rate = Maximum Usage * PM Emission Factor

Company Name: Joseph E. Seagram & Sons, Inc.
Address City IN Zip: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Part 70: T 029-6929
Plt ID: 029-00005
Reviewer: Paula M. Cognitore
Date: October 15, 1996

PM/PM10
EU-37-39

	Maximum Usage	Uncontrolled PM Emission Factor	Uncontrolled PM10 Emission Rate	Uncontrolled PM Emissions	Uncontrolled PM10 Emissions
	(tons/hr)	(lb/ton)	(lb/ton)	(tons/yr)	(tons/yr)
EU-39	7.00	**0.0275**	**0.0075**	**0.843**	**0.230**
EU-37, EU-38	7.00	**0.0275**	**0.0075**	**0.843**	**0.230**
				1.69	**0.460**

Methedology

Emission Factor from AP-42 9.9.1-2.
Emission Rate = Maximum Usage * PM Emission Factor

PM/PM10

Control Efficiency 99.0%	Maximum Usage	PM Emission Factor	PM10 Emission Rate	Uncontrolled PM Emissions	Uncontrolled PM10 Emissions	Controlled PM Emissions	Controlled PM10 Emissions
	(tons/hr)	(lb/ton)	(lb/ton)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
EU-34, EU-35, EU-36	7.00	2.110	0.512	**64.7**	**15.70**	**0.647**	**0.157**

Methedology

PM Emission Factor = Storage silo loading (0.05) + storage silo unloading (0.18) + surge hopper loading (0.05) + surge hopper unloaing (0.18)+ DDG transport for truck or rail car loading (0.0825) + DDG scale (0.0825) = 2.11
PM10 Emission Factor = Storage silo loading (0.0125) + storage silo unloading (0.0436) + surge hopper loading (0.0125) + surge hopper unloading (.0436) + DDG transport for truck or railcar loading, + DDG scale (.2)
Emission Rate = Maximum Usage * PM Emission Factor

Appendix A: Emission Calculations
Tanks and Bottling

Company Name: Joseph E. Seagram & Sons, Inc.
Address City IN Zip: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Part 70: T 029-6929
Plt ID: 029-00005
Reviewer: Paula M. Cognitore
Date: October 15, 1996

EU#	Maximum Usage (PG/yr)	VOC Emission Factor (lb/1000gal)	VOC Emission (lb/hr)	VOC Emissions (tons/yr)
EU-41 (Wine Room)	32000000	1.22	4.46	19.5
EU-42 (Tank Farm)	30000000	1.267	4.34	19.0
EU-43 (Bldg 88)	14000000	0.67	1.07	4.69
EU-45 (Mini Tank Farm)*	10000000	0.718	0.820	3.59
EU-44 (Reguage Tanks)	16100000	0.817	1.50	6.58
EU-51 (Bottling Tank Room)	16000000	0.741	1.35	5.93
EU-52 (Bottling Line)	16000000	0.496	0.906	3.97
EU-53 (Cooler Flavors)	340000	0.527	0.020	0.090
EU-53 (Cooler Tanks & Bottling)*	18000000	0.11	0.226	0.990
Whiskey System	13000000	0.95	1.410	6.175
Gin	12775000	0.913	1.331	5.832
Total			**17.4**	**76.4**

Methedology

* Maximum usage is in gallons per year, P.G. = Proof Gallons
VOC Emissions (lb/hr) = Maximum usage * emission factor/1000/8760
VOC Emissions (tons/yr) = VOC Emissions (lb/hr) * (8760hours/2000lbs)

Appendix A: Emission Calculations
Warehouse Emissions

Company Name: **Joseph E. Seagram & Sons, Inc.**
Address City IN Zip: **7 Ridge Avenue, Lawrenceburg, Indiana 47025**
Part 70: **T 029-6929**
Plt ID: **029-00005**
Reviewer: **Paula M. Cognitore**
Date: **October 15, 1996**

Pollutant	**Emission Factor*** (lbs/barrel/yr)	**# of Barrels**	**Emissions** (lbs/yr)	**Emissions** (tons/yr)
VOC	6.9	541278	3734818	**1867**

*AP-42 Table 9.12.3-1.

# of barrels total from Warehouses C, E, G, J&M, L, and N.

Methodology

VOC emissions (lbs/yr) = emission factor * # of barrels
VOC emissions (tons/yr) = VOC emissions (lbs/yr) / 2000 lb

Appendix A: Emissions Calculations
Coal combustion: Dry Bottom, Bituminous Coal-fired boiler
HAPS

Company Name: **Joseph E. Seagram & Sons, Inc.**
City, Indiana: **7 Ridge Avenue, Lawrenceburg, Indiana**
Part 70: **029-6929**
Plt ID: **029-00005**
Reviewer: **Paula M. Miano**
EU-96 **Date:** **October 15, 1996**

Potential Throughput
tons/year
85,096

Pollutant	Emission Factor (lb/ton)	Potential Emissions (tons/year)
Acetaldehyde	5.7E-04	0.024
Isophorone	5.8E-04	0.025
Lead	4.2E-04	0.018
Magnesium	1.1E-02	0.468
Manganese	4.9E-04	0.021
Benzene	1.3E-03	0.055
Benzyl chloride	7.0E-04	0.030
Methyl chloride	5.3E-04	0.023
Selenium	1.3E-03	0.055
Cyanide	2.5E-03	0.106
Total HAPs		0.825

HAP emission factors are from AP-42 Tables 1.1-13, 1.1-14 and 1.1-18.

Appendix A: Emission Calculations
Industrial Boilers (> 100 mmBtu/hr)

Company Name: Joseph E. Seagram & Sons, Inc.
Address City IN Zip: 7 Ridge Avenue, Lawrenceburg, Indiana
Part 70: T 029-6929
Plt ID: 029-00005
Reviewer: Paula M.Cognitore
Date: October 15, 1996

EU-96 (Alternate Fuel Types)

Section 1: #6 Fuel Oil
Section 2: Natural Gas
Section 3: Wood

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	Potential Throughput MMCF/year
244	17100	2137

Section 1 - No. 6 Fuel Oil

S = Weight % Sulfur: 1

	Pollutant				
	PM	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	12.4 *9.19S + 3.22*	157 *(157S)*	47.0	0.28	5.0
Potential Emission in tons/yr	106.1	1342	402	2.39	42.7

HAPs - Organics

	Benzene	Formaldehyde	Naphthalene	Toluene	Xylene
Emission Factor in lb/kgal	2.1E-04	3.3E-02	1.1E-03	6.2E-03	1.1E-04
Potential Emission in tons/yr	1.83E-03	2.82E-01	9.66E-03	5.30E-02	9.32E-04

HAPs - Metals

	Antimony	Cobalt	Lead	Manganese	Nickel
Emission Factor in lb/kgal	5.3E-03	6.0E-03	1.5E-03	3.0E-03	8.5E-02
Potential Emission in tons/yr	4.49E-02	5.15E-02	1.29E-02	2.56E-02	7.22E-01

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.125 MM Btu
Emission Factors are from AP42 Tables 1.3-1, 1.3-2 and 1.3-3 (SCC 1-01-004-01/02/03 and 1-01-004-05 and 1-02-004-04)
(AP-42 Supplement E 9/98)
Emission (tons/yr) = Throughput (kgals/year) x Emission Factor (lb/kgal)/2,000 lb/ton

Section 2 - Natural Gas

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.50	84.0
Potential Emission in tons/yr	2.03	8.12	0.641	107	5.88	89.8

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

HAPs - Organics

	Benzene	Formaldehyde	Dichlorobenzene	Toluene	Hexane
Emission Factor in lb/MMcf	2.1E-04	7.5E-02	1.1E-03	3.4E-04	1.8E+00
Potential Emission in tons/yr	1.83E-03	6.41E-01	9.66E-03	2.91E-03	1.54E+01

HAPs - Metals

	Cadmium	Chromium	Lead	Manganese	Nickel
Emission Factor in lb/MMcf	1.1E-03	1.4E-03	5.0E-04	3.8E-04	2.1E-03
Potential Emission in tons/yr	9.40E-03	1.20E-02	4.27E-03	3.25E-03	1.80E-02

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Section 3 - Wood

	Moisture (%)	
Fuel - Wet Wood	50.0%	Wet wood has a moisture content of 20% or more

	Pollutant					
Uncontrolled Emissions	PM*	PM10*	SO2	NOx	VOC	CO
Uncontrolled Emission Factor in lb/MMBtu	0.01	0.01	0.024	0.2	0.093	0.500
Potential Emission in tons/yr	10.7	10.7	25.6	214	99.4	534

* PM is filterable only. This is a contolled emission factor.

HAPs - Organics

	Acetaldehyde	Formaldehyde	Acrolein	Benzene	Styrene	Hydrogen Chloride
Emission Factor in lb/MMcf	8.5E-03	9.6E-03	3.0E-03	3.9E-03	1.9E-03	2.0E-02
Potential Emission in tons/yr	1.04E-03	1.17E-03	3.66E-04	4.76E-04	2.32E-04	2.44E-03

HAPs - Metals

	Arsnic	Chromium	Lead	Manganese	Nickel
Emission Factor in lb/MMcf	2.0E-05	9.5E-04	4.8E-05	1.4E-03	3.0E-05
Potential Emission in tons/yr	2.44E-06	1.16E-04	5.86E-06	1.71E-04	3.66E-06

Methodology

AP-42 Heating Value of Wood = 4500 Btu/lb, moisture content of wood estimated by applicant at 50%
Emission Factors from AP-42, Chap. 1.6, Tables 1.6-1, 1.6-2, 1.6-3, and 1.6-4
Emission (tons/yr) = Heat Input Capacity (MMBtu/hr X Emission Factor (lb/MMBtu) X 8,760 hrs/yr X [1 ton/2000 lbs]

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Joseph E. Seagram & Sons, Inc.
Address City IN Zip: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Part 70: 029-6929
Plt ID: 029-00005
Reviewer: Paula M.Cognitore
Date: October 15, 1996

EU-97

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
47.60	416.98

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	50.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.396	1.58	0.125	10.4	1.15	17.5

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: **Joseph E. Seagram & Sons, Inc.**
Address City IN Zip: **7 Ridge Avenue, Lawrenceburg, Indiana 47025**
Part 70: **029-6929**
Plt ID: **029-00005**
Reviewer: **Paula M. Cognitore**
Date: **October 15, 1996**

EU-97

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.378E-04	2.502E-04	1.564E-02	3.753E-01	7.089E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.042E-04	2.293E-04	2.919E-04	7.923E-05	4.378E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: **Joseph E. Seagram & Sons, Inc.**
Address, City IN Zip: **7 Ridge Avenue, Lawrenceburg, Indiana 47025**
Part 70: **T 029-6929**
EU 97 **Plt ID:** **029-00005**
Reviewer: **Paula M. Cognitore**
Date: **October 15, 1996**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
		0.3
45.6	2894.6087	

	Pollutant				
	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	42.6 *(142.0S)*	20.0	0.34	5.0
Potential Emission in tons/yr	2.89	61.7	28.9	0.492	7.24

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 138,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.138 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)
*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: **Joseph E. Seagram & Sons, Inc.**
Address, City IN Zip: **7 Ridge Avenue, Lawrenceburg, Indiana 47025**
Part 70: **T 029-6929**
Plt ID: **029-00005**
Reviewer: **Paula M. Cognitore**
Date: **October 15, 1996**

HAPs - Metals

	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	7.99E-04	5.99E-04	5.99E-04	5.99E-04	1.80E-03

HAPs - Metals (continued)

	Mercury	Manganese	Nickel	Selenium
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05
Potential Emission in tons/yr	5.99E-04	1.20E-03	5.99E-04	3.00E-03

Methodology

No data was available in AP-42 for organic HAPs.
Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Appendix A: Emission Calculations
326 IAC 6-1 Compliance

Company Name: Joseph E. Seagram & Sons, Inc.
Address City IN Zip: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Part 70: T 029-6929
Plt ID: 029-00005
Reviewer: Paula M. Cognitore
Date: October 15, 1996

	Stack/Vent	Allowable Grain Loading per Dry	Gas or Air		Gas or Air
EU	DC #	Std. Cubic foot of Outlet Air	Flow Rate	Temperature	Flow Rate
		(g/dscf)	(acfm.)	(F)	(dcfm.)
11/13	103	0.020	12600.0	68.0	12398.4
12	111	0.020	15000.0	68.0	14760.0
12	112	0.020	1354.0	68.0	1332.3
14	104	0.020	6000.0	68.0	5904.0
32	305-309	0.020	5000.0	200.0	3936.0
32	310	0.020	5000.0	120.0	4478.9
34	341-342	0.020	905.0	68.0	890.5
34	343-343	0.020	86.0	68.0	84.6
35	350	0.020	905.0	68.0	890.5
36	360	0.020	905.0	68.0	890.5
37-39*	111,370,380	0.020	15000.0	68.0	14760.0

EU	DC #	Potential Emissions	Controlled Emissions	<.03	Allowable (6-1)
		(lb/hr)	(lb/hr)	(gr/dscf)	(lb/hr)
11/13	103	38.584	0.1925	0.00181	3.19
12**	111	164.612	1.2000	0.00949	3.80
12**	112	161.644	0.2190	0.01918	0.34
14	104	27.800	0.1390	0.00275	1.52
32	305	5.416	0.8128	0.02409	1.01
32	306	5.416	0.8128	0.02409	1.15
32	307	3.080	0.4612	0.01367	0.23
32	308	3.080	0.4612	0.01367	0.02
32	309	3.080	0.4612	0.01367	0.23
32	310	2.760	0.4132	0.01076	0.23
34	341-342	The emissions for EU-34, EU-35 and EU-36 were calculated together and			
34	343-343	the apportionment to each stack can not be determinied with the given infomation.			
35	350				
36	360				
37-39**	111,370,380	0.0642	1.25	0.00988	3.80

* Units EU-37 - EU-39 have all the same stack parameters and emissions.

** The Controlled emission number represents the limit pursuant to CP 029-6331-00005.